

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB
MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Civil Action No. 2:14-cv-00029-AB

Plaintiffs,

v.

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**DECLARATION OF STEVEN F. MOLO IN SUPPORT OF
PETITION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

I, Steven F. Molo, declare, pursuant to 28 U.S.C. § 1746:

1. I submit this declaration in support of the Faneca Objectors'¹ Petition for an Award of Attorneys' Fees and Expenses in connection with services rendered to the benefit of the settlement class in the above-captioned case. I have personal knowledge of the matters set forth in this Declaration, and if called upon, I would testify as follows:

¹ In earlier proceedings in this Court, MoloLamken LLP represented seven objectors: Sean Morey, Alan Faneca, Robert Royal, Roderick Cartwright, Ben Hamilton, Sean Considine, and Jeff Rohrer. This Court previously referred to these objectors collectively as the "Morey Objectors." Three of those objectors – Sean Morey, Robert Royal, and Ben Hamilton – have since opted out. Thus, we now refer to the objectors presently represented by MoloLamken as the "Faneca Objectors."

I. FIRM BACKGROUND AND QUALIFICATIONS

2. I founded MoloLamken LLP along with Jeffrey Lamken in October 2009. We are a litigation boutique with offices in New York, Chicago, and Washington, D.C. MoloLamken's practice is devoted exclusively to complex civil and criminal litigation throughout the United States. We handle matters in trial courts before judges and juries, as well as in appellate courts, including the Supreme Court of the United States. Indeed, we are one of a small number of firms to appear regularly before the Supreme Court.

3. Our firm and its lawyers have been recognized in a wide array of legal listings and publications such as *Chambers & Partners*; *SuperLawyers*; *Lawdragon*; *Best Lawyers in America*; *Euromoney*; *PLC Which Lawyer*; *Leading Lawyers*; *Washingtonian Magazine*; *New York Magazine*; *Martindale Hubbell*; *U.S. News and World Report*; *Vault.com*; and *International Global Law Experts*. *ACQ Magazine* has named MoloLamken its U.S. Boutique Litigation Law Firm of the Year. In this past year, we were named by *The National Law Journal* to its "Litigation Boutiques Hot List" and by *Benchmark Litigation* to its list of "Top Ten Litigation Boutiques in America." Additional information about our firm can be found at <http://www.mololamken.com>.

4. On behalf of our clients, MoloLamken regularly is adverse to many of the nation's leading litigation firms and important government agencies. In the past year, apart from the lawyers we faced in this case, our opponents have included: Davis Polk & Wardwell LLP; Skadden, Arps, Slate, Meagher & Flom LLP; Williams & Connolly LLP; Jones Day; Kaye Scholer LLP; King & Spalding LLP; Orrick, Herrington & Sutcliffe LLP; Gibson, Dunn & Crutcher LLP; Sidley Austin LLP; Quinn Emanuel Urquhart & Sullivan, LLP; Paul, Weiss, Rifkind, Wharton & Garrison LLP; Simpson Thacher & Bartlett LLP; Stroock & Stroock & Lavan LLP; DLA Piper; Cozen O'Connor PC; Loeb & Loeb LLP; Jenner & Block LLP; Weil,

Gotshal & Manges LLP; Fish & Richardson PC; Durie Tangri LLP; and Covington & Burling LLP; as well as the United States Attorney's Offices for the Southern District of New York, the Eastern District of New York, the District of Columbia, the Eastern District of Virginia, the Eastern District of Wisconsin, the District of Arizona, the District of New Mexico, the Northern District of California, and the Northern District of Illinois; the United States Department of Justice's Fraud Section; the Securities and Exchange Commission's Enforcement Division; the Offices of the Inspector General for the Department of Justice and the Department of Veterans Affairs; the United States Department of Justice Public Integrity Section; Congressional investigative committees; and the Solicitor General of the United States.

5. Before forming MoloLamken, I was a partner at Shearman & Sterling LLP, and before that, at Winston & Strawn LLP where I was a member of the firm's executive committee. I began my career as a prosecutor. A copy of my biography is attached as Exhibit 1.

6. Partners and associates come to our firm with experience – associates typically have clerked for one or two federal judges. The MoloLamken lawyers most significantly involved in this matter in addition to me – Thomas Wiegand, Martin Totaro, Eric Nitz, Kaitlin O'Donnell, and Rayiner Hashem – all have distinguished backgrounds for their respective roles in the matter. Copies of their biographies are attached as Exhibit 2. Following the completion of most of the work for the Faneca Objectors, Martin Totaro and Kaitlin O'Donnell left the firm to perform government service – Mr. Totaro as a lawyer for the United States Securities and Exchange Commission and Ms. O'Donnell as an Assistant United States Attorney in Florida.

II. MOLOLAMKEN'S EFFORTS ON BEHALF OF THE SETTLEMENT CLASS

A. Our Retention To Evaluate the Fairness of the Settlement

7. In August 2013, the parties in this case announced that they signed a term sheet for a global settlement of the concussion claims against the NFL. The basic terms of the deal

were widely reported in the news media. *See* Press Release, Ret. Judge Layn Phillips, NFL, Retired Players Resolve Concussion Litigation (Aug. 29, 2013), *available at* <http://static.nfl.com/static/content/public/photo/2013/08/29/0ap2000000235504.pdf>.

8. After the public announcement of the settlement, MoloLamken was retained to evaluate the terms of the settlement and, if necessary, to advocate for further improvements to ensure that the interests of all class members were reflected in the settlement. We accepted the representation on a 100% contingent-fee basis, with our fee based solely on our improving the settlement. We did not request (and will not receive) any payment from any settlement award to any of our clients.

9. We immediately began evaluating the settlement, as it was described in the press release and media reports. That required review of the underlying claims and the scientific relationship between repetitive head injury, neurocognitive impairment, and neurodegenerative disease. It also required review of the NFL's actions regarding concussions and the various science the NFL had sponsored on the topic.

10. We concluded that the basic terms of the settlement were flawed. In anticipation of the filing of the settlement agreement and motion for preliminary approval, we began preparing an opposition that raised the issues that were initially identified in our motion to intervene. Dkt. 6019.

B. Our Advocacy Challenging the Revised Settlement

11. On January 6, 2014, Class Counsel and the NFL filed the Initial Settlement and a class action personal-injury complaint, along with a motion for preliminary approval of the settlement. Dkt. 5634.

12. The full terms of the Initial Settlement confirmed our conclusion – the settlement agreement contained fundamental defects that required correction. Before MoloLamken could

file our objection to the settlement agreement, this Court recognized one of those defects: the Monetary Award Fund (“MAF”) was capped at \$675 million and the parties had not offered any evidence to show that that amount would be sufficient to cover all claims by the settlement class. Accordingly, it denied preliminary approval *sua sponte*. See *In re Nat’l Football League Players’ Concussion Injury Litig.*, 961 F. Supp. 2d 708 (E.D. Pa. 2014).

13. Our analysis of the Initial Settlement identified other issues with the settlement besides the \$675-million cap on the MAF. We recognized that the settlement did not compensate future cases of CTE – which Class Counsel had claimed, and which we believed based on our own investigation – to be the most significant disease resulting from repetitive head injury. We also noted that the settlement applied a 75% reduction to the monetary award of any player who suffered a stroke or a traumatic brain injury (“TBI”) not related to NFL play. We realized that those defects created potential intra-class conflicts given that the proposed class representatives, Kevin Turner and Shawn Wooden, did not allege a risk of developing CTE and did not allege that they would be subject to the 75% reductions for stroke or non-NFL TBI. Our concerns about these and other deficiencies in the settlement led us to seek a seat at the negotiating table.

14. Based on our belief that the settlement was flawed apart from the MAF having been capped at \$675 million, we filed a motion to intervene on May 5, 2014. Dkt. 6019. Our goal was to advocate for the interests of class members that we believed had not been adequately addressed in the Initial Settlement. Our motion argued that intervention was necessary because our clients had symptoms indicative of CTE and neither of the proposed class representatives had alleged a risk of developing CTE. We also pointed out the potential intra-class conflict created by the 75% reductions for stroke or non-NFL TBI, and the fact that neither proposed class

representative had stated that they would be subject to those reductions. Our motion was the first filing to raise those potential intra-class conflicts in the settlement.

15. Before the Court could rule on the motion to intervene, the NFL and Class Counsel announced a Revised Settlement on June 25, 2014. Dkt. 6073. The Revised Settlement addressed the Court's concern by removing the cap on the MAF. But other problems we had identified in the Initial Settlement remained. Thus, when Class Counsel moved for preliminary approval of the Revised Settlement, we filed a combined objection to the Revised Settlement and opposition to the motion for preliminary approval. Dkt. 6082. No other class member filed an objection or opposition to the June 2014 motion for preliminary approval.

16. Our 47-page objection and opposition challenged the Revised Settlement on numerous grounds. For example, we argued that the failure to compensate future cases of CTE created an intra-class conflict. Dkt. 6082 at 19-26. We also challenged the settlement's failure to provide credit for seasons played in NFL Europe, and the 75% reductions for stroke and non-NFL TBI, which also created potential intra-class conflicts. *Id.* at 26-29. Those conflicts, we argued, precluded approval of the settlement under Fed. R. Civ. P. 23(a)(4). We also objected to unduly burdensome procedural requirements, such as the \$1,000 fee for appealing adverse claim determinations, *id.* at 32-35, and Class Counsel's failure to conduct discovery before settlement, *id.* at 40-47.

17. Our objection and opposition cited over a dozen scientific and journal articles describing cutting-edge research by scientists on the vanguard of concussion and CTE research, like Dr. Ann McKee, Dr. Robert Stern, and Dr. Steven DeKosky. Dkt. 6082 at v-ix.

18. The Court granted preliminary approval, setting a fairness hearing for November 19, 2014, and ordering any objections to the revised settlement to be filed by October 14, 2014.

Dkts. 6083, 6084. Recognizing that all class members would benefit if the defects in the Revised Settlement were addressed sooner, rather than later, we filed a petition seeking appellate review of the preliminary approval order under Fed. R. Civ. P. 23(f). Dkt. 6166. Both Class Counsel and the NFL filed a response, and the Third Circuit ordered us to file a reply. *See Order, In re Nat'l Football League Players' Concussion Injury Litig.*, No. 14-8103 (3d Cir. Aug. 8, 2014). The Third Circuit, in a special sitting, held oral argument on September 10, 2014. The petition was ultimately dismissed on procedural grounds. Our petition to the Third Circuit did not delay the fairness hearing or proceedings in this Court.

19. While the Rule 23(f) petition was pending before the Third Circuit, we began preparing our objection to final approval of the settlement. We filed our 86-page objection on October 6, 2014, eight days before the October 14, 2014 deadline. Dkt. 6201. Our objection explained how the intra-class conflicts created by the settlement's treatment of CTE and NFL Europe both precluded certification, *id.* at 21-36, and rendered the settlement unfair, *id.* at 54-84. It also addressed the potential intra-class conflict created by the 75% reductions for stroke and non-NFL TBI, *id.* at 32-36, the settlement's procedural hurdles to recovery, *id.* at 73-78, and the shortcomings of the BAP, including the \$75-million cap, *id.* at 72-73. We also challenged the notice. *Id.* at 37-53.

20. The objection included 82 supporting exhibits comprising more than 700 pages. Dkt. 6201-1 to 6201-15. Much of this material was scientific evidence – journal articles and research developed through our consultation with experts in neurology and neuropsychology regarding concussions, CTE, and other neurodegenerative diseases. We thus framed the debate on the scientific evidence. The objection included an eight-page scientific appendix describing the science and symptoms of CTE. Dkt. 6201 at A4-A11.

21. The exhibits filed in support of our objection also included declarations from two preeminent experts, Dr. Robert Stern and Dr. Sam Gandy. Dkt. 6201-16 (Dr. Stern); Dkt. 6232-1 (Dr. Gandy). Dr. Stern is a Professor of Neurology, Neurosurgery, and Anatomy & Neurobiology at Boston University School of Medicine where he is also the Director of Clinical Research for the BU Chronic Traumatic Encephalopathy Center. Dkt. 6201-16 ¶¶ 1, 17. Dr. Stern is a leading researcher on CTE and has received funding from the NIH and the Department of Defense for his work on developing methods of detecting and diagnosing CTE. *Id.* ¶¶ 17-19. Dr. Gandy is Professor of Alzheimer's Disease Research and Professor of Neurology and Psychiatry at Mount Sinai School of Medicine. Dkt. 6232-1 ¶ 1. He is Associate Director of the Mount Sinai Alzheimer's Disease Research Center in New York City, and Chairman Emeritus of the National Medical and Scientific Advisory Council of the Alzheimer's Association. *Id.* Dr. Gandy is an expert on the metabolism of amyloids and applies that expertise in researching distinctions between CTE and Alzheimer's diagnoses in the living. *E.g., id.* ¶¶ 13-14. No other class member submitted such scientific evidence – by way of expert declarations or research articles – to the Court. Thus, we built the evidentiary record relied on by essentially all objectors.²

22. We also submitted evidence regarding conditions in NFL Europe. Our client, objector Sean Morey, who played three seasons in NFL Europe, submitted a declaration

² Several other objectors either incorporated MoloLamken's objection by reference or explicitly referred to the evidence that MoloLamken had submitted. *See, e.g.,* Miller Objection, Dkt. 6213 (incorporating MoloLamken's entire objection); Alexander Objection, Dkt. 6237 (incorporating sections of MoloLamken's objection); Chesley Objection, Dkt. 6242 (appending Dr. Stern's Declaration). Indeed, the Chesley Objectors, represented by Zuckerman Spaeder LLP, attached a copy of the Stern Declaration that had been filed with our objection without disclosing to the Court that this was evidence MoloLamken had obtained. Dkt. 6242-1 Ex. 1. And 29 class members submitted letters on their own behalf referencing or adopting MoloLamken's objection. A few objectors submitted one or two research articles, Dkts. 6372, 6433, or reattached evidence that had been previously submitted to the Court, Dkts. 6241, 6242, 6233.

describing the conditions that he experienced there. Dkt. 6201-17. And we developed and submitted other evidence supporting our argument that the claims of players in NFL Europe had been bargained away in the Revised Settlement. *See* Dkt. 6201 at 35 & nn.39-40 (quoting radio interview of Class Counsel and newspaper articles about injuries in NFL Europe).

23. Sixteen other objections were filed in this proceeding by objectors who were represented by counsel – almost all at least one week after the Faneca Objectors’ objection. With the exception of the Williams objection, which raised the issue of the unavailability of medical records due to *force majeure* events, the other objections reiterated arguments made in the Faneca Objectors’ filing, or raised arguments that did not receive serious consideration from the Court. A summary of the issues raised in those other objections is attached as Exhibit 3.

24. Although MoloLamken had developed and submitted a massive scientific and evidentiary record in support of our objection, there was certain information about the claims and the settlement that was known by Class Counsel and the NFL, but not objectors. Thus, we repeatedly requested discovery from the settling parties. On September 13, 2014, we filed a motion for leave to conduct limited discovery through document requests and interrogatories in preparation for the fairness hearing. Dkt. 6169. And on October 21, 2014, we filed a motion seeking discovery of the evidence Class Counsel and the NFL would rely upon at the fairness hearing. Dkt. 6252.

25. On November 4, 2014, the Court appointed me, along with William Hangley of Hangley Aronchick Segal Pudlin & Schiller, liaison counsel for the objector groups and asked us to coordinate the presentation of objections at the November 19, 2014 fairness hearing. Dkt. 6344. In that capacity, our firm engaged in extensive communications with the various groups of

represented objectors – both by phone and email – to achieve the orderly and effective presentation of issues without duplication.

26. We sought leave to present the testimony of our expert witnesses, Dr. Stern and Dr. Gandy, at the fairness hearing. Dkt. 6339. We also requested the opportunity to cross-examine adverse witnesses with information related to the underlying claims, including Dr. Ira Casson and Dr. Elliott Pellman – NFL physicians responsible for promulgating the dubious, NFL-sponsored science at the heart of the class claims. *Id.* at 8-9. No other objector sought to introduce expert testimony; no other objector sought to question adverse witnesses at the fairness hearing. Ultimately, however, the Court opted not to hear live testimony and received Dr. Stern’s and Dr. Gandy’s testimony through the declarations that we had submitted in support of our objection.

27. At the Court’s direction, I made the lead argument at the fairness hearing, discussing the defects in the Revised Settlement related to CTE, NFL Europe, and the 75% reductions for stroke and non-NFL TBI, among other topics. Thomas Wiegand and Martin Totaro, both of MoloLamken, also made arguments at the Fairness Hearing, addressing a number of other shortcomings in the Revised Settlement – including, among other issues, the cap on the BAP Fund, the problems with the \$1,000 appeal fee, and the problems associated with the Revised Settlement’s testing regimen for neurocognitive impairments. Rather than merely attacking the Revised Settlement, we provided the Court with concrete steps that could be taken to improve it. For example, we suggested giving credit for seasons played in NFL Europe, extending the Death with CTE benefit to more class members, lifting the cap on the BAP Fund, and “evening-up” the appeal process by, among other things, accommodating financial hardship in the appeal-fee requirement.

28. Following the fairness hearing, the Court invited the parties to submit supplemental briefing. Throughout the case, we had followed the developing science regarding MTBI and continued discussions with experts in the fields of neurology, neuropsychology, pathology, and neuroimaging. Thus, when we submitted a supplemental brief in support of our objection, Dkt. 6455, we provided the Court with still more evidence that supported our arguments. We attached 27 exhibits to our supplemental brief, comprising over 450 pages of material. Dkt. 6455-13 to 6455-23.

29. Moreover, both Dr. Stern and Dr. Gandy submitted supplemental declarations addressing scientific points raised by the NFL and Class Counsel, which expanded on the conclusions in their earlier declarations. Dkt. 6455-1 (Dr. Stern); Dkt. 6455-2 (Dr. Gandy). But even beyond those supplemental declarations, our firm recruited *nine* additional prominent experts in neurology and related fields to submit declarations attesting to statements about CTE that were well-accepted in the scientific community. Like Dr. Stern and Dr. Gandy, these additional experts are all at the top of their fields and among the most distinguished researchers in neuroscience.

- a. Dr. Patrick Hof is the Regenstreif Professor of Neuroscience at the Icahn School of Medicine at Mount Sinai, New York. Dkt. 6455-3 ¶1. The Director of Mount Sinai's Kastor Neurobiology of Aging Laboratories, Dr. Hof researches selective neuronal vulnerability in dementing illnesses. *Id.* Ex. A at 2, 6.
- b. Dr. Jing Zhang is the Shaw Endowed Professor of Pathology at the University of Washington, Seattle. Dkt. 6455-4 Ex. A at 1. Dr. Zhang's

research covers identification of biomarkers used to diagnose and track the progression of neurodegenerative disorders. *Id.* Ex. A at 2, 6-7.

- c. Dr. Martha Shenton is a Professor in the Department of Psychiatry and Radiology at Brigham and Women's Hospital and Harvard Medical School. Dkt. 6455-5 ¶1. Dr. Shenton is the Director of the Psychiatry Neuroimaging Laboratory and has expertise in the neuroimaging of brain abnormalities. *Id.* Ex. A at 3, 10.
- d. Dr. Charles Bernick is the Associate Medical Director of the Cleveland Clinic Lou Ruvo Center for Brain Health. Dkt. 6455-6 ¶1. Dr. Bernick is the lead researcher on a longitudinal study at the Cleveland Clinic to measure the effects of long-term head trauma in combat sports, focusing on early identification of neurocognitive decline and the prediction of long-term neurological consequences. *E.g., id.* Ex. A at 5, 7-8; *see also* Charles Bernick, NRPA 2015 Annual Conference, <https://nrpa.eventential.org/Speakers/Details/86868>.
- e. Dr. Michael Weiner is a Professor in Radiology and Biomedical Engineering, Medicine, Psychiatry, and Neurology at the University of California, San Francisco. Dkt. 6455-7 ¶1 & Ex. A at 3. Dr. Weiner's research covers the development and utilization of MRI and PET for investigating and diagnosing neurodegenerative diseases, and he is the Principal Investigator of the Alzheimer's disease Neuroimaging Initiative, one of the largest observational studies in the world concerning Alzheimer's disease. *Id.* Ex. A at 5.

- f. Dr. James Stone is an Associate Professor of Radiology and Medical Imaging at the University of Virginia Health System. Dkt. 6455-8 Ex. A at 2. Dr. Stone is the co-director of the University of Virginia Brain Injury and Sports Concussion Institute which covers research in traumatic brain injuries through molecular imaging and MRI diagnoses. *Id.* ¶ 1.
- g. Dr. Thomas Wisniewski is a Professor of Neurology, Pathology and Psychiatry at New York University School of Medicine. Dkt. 6455-9 ¶ 1. Dr. Wisniewski runs an active research laboratory focusing on neurodegenerative disorders and is also the co-director of the NIH-funded NYU Alzheimer's Disease Center. *E.g., id.* Ex. A at 10-12.
- h. Dr. Steven DeKosky served as the Dean of the University of Virginia School of Medicine until 2013. Dkt. 6455-10 Ex. A at 3. He is currently the Aerts-Cosper Professor of Alzheimer's Research at the University of Florida College of Medicine, and is Deputy Director of the McKnight Brain Institute. *See* Steven T. DeKosky, UF Department of Neurology, <http://neurology.ufl.edu/divisions-2/memory-and-cognitive-disorders/memory-and-cognitive-faculty/steven-t-dekosky-md/>. Dr. DeKosky's research centers on structural and neurochemical changes from traumatic brain injuries. Dkt. 6455-10 Ex. A at 7. He was an author of the first report on CTE in American professional football players. Dkt. 6201-11 Ex. 56.
- i. Dr. Wayne Gordon is the Jack Nash Professor and Vice Chair of the Department of Rehabilitation Medicine at the Icahn School of Medicine at

Mount Sinai, New York. Dkt. 6455-11 ¶1. Dr. Gordon provides neuropsychological evaluations and treatment for individuals who have sustained a brain injury, and he received a recognition award from the New York State Department of Health for his “visionary work” in traumatic brain injuries. Wayne A. Gordon, Mount Sinai, <http://www.mountsinai.org/profiles/wayne-a-gordon>.

30. We filed our supplemental brief with supporting evidence on December 2, 2014. Dkt. 6455. The 30-page filing specifically addressed arguments raised by Class Counsel and the NFL. Moreover, it identified potential improvements to the Revised Settlement that would address our previously identified concerns. *Id.* at 30-31.

31. We also continued our efforts to unearth information relevant to the settlement. On December 9, 2014, we filed a motion for the production of documents by the NFL concerning the exposé *League of Denial: The NFL’s Concussion Crisis*, and insurance coverage. Dkt. 6461. On December 9, 2014, we filed a motion for disclosure by Class Counsel and the NFL of payments made to their experts. Dkt. 6462.

32. In all, MoloLamken prepared and filed with this Court over 150 pages of legal analysis explaining why defects in the settlement rendered it unfair. In support of those filings, we compiled an evidentiary record consisting of more than 100 exhibits containing more than 1,000 pages of evidence and scientific research. We obtained declarations from *eleven* of the most prominent and well-respected researchers in the fields of neurology, neuropsychology, pathology, and bioimaging, including the world’s leading researchers on CTE.

33. This Court credited many of our arguments and much of our evidence. On February 2, 2015, it issued an Order identifying changes that it believed would enhance the

fairness of the Revised Settlement. Dkt. 6479. Specifically, the Court suggested that the parties: provide some credit for seasons played in NFL Europe, ensure a baseline examination for each qualifying class member regardless of the cap on the BAP Fund, provide a hardship provision waiving the appeal fee in certain cases, and extend the Death with CTE Qualifying Diagnosis to individuals who died prior to Final Approval. *Id.* The Court also suggested that the parties consider providing reasonable accommodation for class members whose medical records were unobtainable because of *force majeure* events. *Id.*³

34. The settling parties adopted all of the Court's recommendations, resulting in the Final Settlement. Dkt. 6481 & Ex. A. These changes to the Revised Settlement dramatically improved its value, in particular the provision of credit for seasons played in NFL Europe, the extension of the timeline for the Death with CTE payment, and the guarantee of receiving a baseline assessment examination.

C. Our Work in Attempting To Further Improve the Revised Settlement Through Negotiations

35. Still, these improvements to the Revised Settlement did not fully address what we saw as a substantial issue – the treatment of CTE. Heartened by the NFL's willingness to continue refining the Revised Settlement, we began exploring and researching how to provide some additional benefit for CTE (or its symptoms) in a way the NFL might find acceptable. As part of that research, we continued our discussions with our experts to identify the most cost-effective ways of treating CTE or alleviating its symptoms. I consulted with Chris Seeger, Co-Lead Class Counsel, and informed him that we remained concerned about the Revised Settlement's treatment of CTE and that I wanted to negotiate directly with the NFL and use the

³ The accommodation for class members whose medical records were lost because of *force majeure* events was **not** raised by MoloLamken. It was raised by the Estate of Delano R. Williams, Dkt. 6221, represented by the Shah Law Firm.

prospect of MoloLamken forgoing an appeal in exchange for further improvements related to CTE. Mr. Seeger supported our efforts to attempt to further improve the Final Settlement.

36. In April 2015, I, along with my partner Thomas Wiegand, met with counsel for the NFL, Brad Karp and Bruce Birenboim of Paul, Weiss, Rifkind, Wharton & Garrison LLP, in person and over the phone, to propose further revisions to the Final Settlement that would enhance the benefit associated with CTE. We provided the NFL with a written presentation and had follow-up phone conversations with the NFL's counsel to further discuss the proposal.

37. On April 22, 2015, the Court issued its order certifying the class for settlement purposes and giving final approval to the Final Settlement. Dkts. 6509, 6510. MoloLamken continued discussions with counsel for the NFL in the hope of securing further modifications to the settlement. Recognizing the pressing need to provide relief to the class as soon as possible, we hoped we could obtain additional benefits and obviate the need for appeal. Ultimately, the NFL rejected our proposal. We then made a second proposal to the NFL with an alternative means of financing further benefits for symptoms associated with CTE. MoloLamken and counsel for the NFL had multiple phone conversations in May 2015 about the second proposal. Notwithstanding our efforts, the NFL was unwilling to further modify the settlement.

D. Our Work on Appeal

38. Believing there were significant issues on appeal, the Objectors represented by MoloLamken filed a notice of appeal on May 22, 2015. Dkt. 6568.

39. MoloLamken prepared and coordinated filing of the joint appendix for the benefit of all appealing objectors as well as the settling parties. We filed our opening brief on August 19, 2015. Faneca CA3 Br., No. 15-2304. Given that many of our objections were addressed in the Final Settlement, our challenges on appeal largely focused on the settlement's treatment of CTE and the 75% reductions for stroke and non-NFL TBI. We argued that the class lacked

adequate representation, in contravention of Rule 23(a)(4), and that the Final Settlement was not fair, adequate, and reasonable, in contravention of Rule 23(e). Other objectors who appealed from the final approval order relied heavily on the evidentiary record we had compiled and echoed arguments that we had been making since we filed our motion to intervene in this Court on May 5, 2014. *See, e.g.*, Armstrong CA3 Br., No. 15-2272, at 6-11, 13-14, 18-19, 34-36; Jones CA3 Br., No. 15-2291, at 4. Others adopted our arguments by reference. *See* Heimbürger CA3 Br., No. 15-2206, at 5; Carrington CA3 Br., No. 15-2234, at 6, 15; Anderson CA3 Br., No. 15-2230, at 25.

40. The Third Circuit held oral argument on November 19, 2015 in an extended, two-hour session. I presented the lead opening argument and the final rebuttal argument, focusing on fairness and adequacy of representation, and the other issues that we had briefed. The argument occurred while I was in the midst of a jury trial in the United States District Court for the Southern District of New York in which I was representing the former Speaker of the New York Assembly, who was facing corruption charges. The judge adjourned the trial to allow me to go to the Third Circuit and argue the appeal.

41. All throughout the briefing of the appeal, and even after oral argument, we continued monitoring for factual and scientific developments relevant to the case. For example, we drew the court's attention to recent scientific evidence suggesting "a direct link from TBI to CTE." Faneca CA3 Br. 40 (quoting Kondo *et al.*, *Antibody Against Early Driver of Neurodegeneration cis P-tau Blocks Brain Injury and Tauopathy*, *Nature* (July 15, 2015)). We also were the first to draw the court's attention to statements from NFL Vice President Jeff Miller admitting a link between concussion and CTE. Faneca CA3 28(j) Letter, No. 15-2304.

42. On April 18, 2016, the Third Circuit issued its opinion affirming the Court’s final approval order. *In re Nat’l Football League Players’ Concussion Injury Litig.*, 821 F.3d 410 (3d Cir. 2016). Even though the Third Circuit affirmed this Court’s approval of the Final Settlement, it noted the value to the class resulting from the truly adversarial process occasioned by the Faneca Objectors’ advocacy. “[O]bjectors,” the Third Circuit explained, were “well-intentioned in making thoughtful arguments” and “aim[ed] to ensure that the claims of retired players [were] not given up in exchange for anything less than a generous settlement agreement negotiated by very able representatives.” *Id.* at 447.

E. Our Decision Not To Seek Supreme Court Review

43. Drawing on our firm’s extensive experience in Supreme Court advocacy, we closely analyzed that opinion. Several lawyers with the firm – including my partner Jeffrey Lamken, one of the nation’s leading Supreme Court advocates – participated in that analysis. A copy of Mr. Lamken’s biography is attached as Exhibit 4. Professor Linda Mullenix did as well. We considered whether the Third Circuit’s decision merited Supreme Court review. We ultimately concluded it did not. For that reason, the objectors represented by MoloLamken did not seek further review in the Supreme Court. An almost three-year campaign to improve the settlement had resulted in a Final Settlement with a financial value more than \$100 million greater than the value of the Revised Settlement previously negotiated between Class Counsel and the NFL. We recognized that it was in the best interests of the class for the Final Settlement to be implemented as quickly as possible. At all times, we have been mindful that this case was not an academic exercise and that the relief being sought has a direct impact on the lives of seriously injured individuals as well as those closest to them.

44. Although our efforts to secure further improvements beyond those in the Final Settlement were unsuccessful, those efforts still brought substantial benefits to the class. They

ensured that the settlement ultimately approved by the Court was the very best settlement that could have been achieved for the class – in a highly complex matter involving evolving science. As our attempt to negotiate further benefits proved, there were no more concessions to squeeze from the NFL. And our vigorous advocacy on appeal ensured that any open questions about the Final Settlement’s compliance with Rule 23 were resolved.

III. MOLOLAMKEN’S TOTAL FEES AND EXPENSES

45. Over the course of three years and two months, MoloLamken devoted a total of 6,004.2 hours of time on behalf of the class. At current hourly billing rates for attorneys and professional support staff, that represents a lodestar of \$4,098,319.00.⁴ Exhibit 5 is a chart summarizing the total number of hours and fees that MoloLamken devoted to this litigation. The hourly rates reflected are current market rates that other clients have agreed to pay MoloLamken for legal representation. Based upon my experience, these rates are consistent with those charged by law firms engaged in the type of complex, high-stakes work that our firm does. As a further indication of the reasonableness of the rates used, we would welcome a comparison of our hourly rates to those of Paul, Weiss, Rifkind, Wharton, & Garrison LLP, our distinguished chief opponent as counsel to the NFL. Exhibit 6 is a chart summarizing the total number of hours by litigation task.

46. As explained above, MoloLamken litigated this matter on a 100% contingent-fee basis. Ordinarily, we would expect to negotiate a fee of between 35% and 45% to undertake a representation of this nature on a 100% contingent-fee basis.

⁴ Because MoloLamken has requested a fee based on the value we brought to the settlement, and is submitting summaries of time spent only as a lodestar cross-check, we have not submitted detailed time entries for the work that our attorneys performed. Doing so would require extensive review and redaction to preserve privilege. Nevertheless, should the Court request those time entries – which are extensive – they can be provided. *See In re Rite Aid Corp. Sec. Litig.*, 396 F.3d 294, 306-07 (3d Cir. 2005).

47. MoloLamken also incurred substantial expenses in the course of this matter. In total, MoloLamken expended \$47,998.52 in costs and expenses. Those costs and expenses are broken down by category in the chart attached as Exhibit 7. Those costs were incurred on behalf of the class and are listed as actual costs with no administrative overhead applied. Consistent with MoloLamken's practices, the expense statement does not reflect charges for ordinary expenses like standard electronic research, ordinary copying, local travel, secretarial overtime, and standard postage. The expenses are reflected in MoloLamken's books and records, and were prepared from receipts, check records, and other source materials. They represent an accurate recording of the expenses that MoloLamken actually incurred.

48. I have reviewed the time and expenses reported by my firm in this case that are included in this declaration, and I affirm that they are true and accurate. In my experience, these fees and expenses are reasonable.

49. In the course of representing objectors in this case, MoloLamken associated with William Hangley of the law firm Hangley Aronchick Segal Pudlin & Schiller. Mr. Hangley and his firm are highly regarded advocates and worked closely with me and other members of MoloLamken. They were of great assistance in securing the benefits to the class described in this declaration. Mr. Hangley's firm devoted 281.8 hours of time to this case which, at their standard hourly billing rates, amounts to \$175,058.50 in fees. Hangley Aronchick also incurred \$3,829 in expenses. Attached as Exhibit 8 is a declaration of Mr. Hangley attesting to his firm's involvement in the case. His description of his firm's work in this matter is accurate.

50. MoloLamken also retained Prof. Linda Mullenix, an expert in class action law, to assist in the representation. Prof. Mullenix worked closely with me and other members of MoloLamken. Her services, too, were a valuable asset to our successful efforts to improve the

settlement. Prof. Mullenix devoted 71.25 hours of consulting time to this case. At her standard hourly rates, that amounts to a total fee of \$39,187.50. Attached as Exhibit 9 is a declaration of Prof. Mullenix attesting to her involvement in this case. Her description of her work in this matter is accurate.

IV. DATA REGARDING THE VALUE OF IMPROVEMENTS RESULTING FROM MOLOLAMKEN'S EFFORTS

51. Attached as Exhibit 10 is a table reflecting the total number of “compensated seasons” in the settlement. A “compensated season” is an eligible season under the settlement that will increase the size of a class member’s monetary award. Because all class members with five or more seasons receive 100% of the maximum monetary award, all such players are listed as having only five “compensated seasons” whether their career in the NFL spanned five years, ten years, or more. The data in this table regarding the number of years played and the number of players was drawn from Table 4-3 of Class Counsel’s actuarial report. Dkt. 6167 at 18. The total number of compensated seasons under the settlement was calculated by multiplying the number of players by the number of compensated seasons.

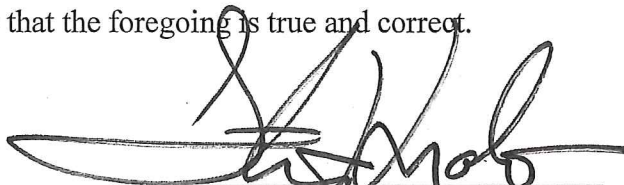
52. Attached as Exhibit 11 is a table showing the names of players who played in NFL Europe, the number of seasons each played in NFL Europe (excluding years in which the player also played a season in the NFL), and the number of seasons each player played in the NFL (if any). Data were obtained from The Football Database, *NFL Europe/World League of American Football*, <http://www.footballdb.com/nfl-europe>.

53. Attached as Exhibit 12 is a table showing the retired NFL players who died between the date of preliminary approval (July 7, 2014) and the date of final approval (April 22, 2015). Data regarding the individuals, the date of their death, and their age at death were taken from *Oldest Living Pro Football Players, 2016-2010 Pro Football Necrology List*,

<http://www.oldestlivingprofootball.com/present2010necrology.htm#961267027>. Unless otherwise indicated on the chart, the number of seasons played for each player was taken from statistics on the NFL's website.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 11, 2017
In New York, New York



Steven F. Molo

Exhibit 1

LAWYER PROFILES



Steven F. Molo

Steven Molo, one of the country's leading courtroom advocates, is a founding partner of the national litigation boutique, MoloLamken LLP. He represents corporations, boards, funds, investors, inventors, and individuals in complex business litigation, white collar criminal and regulatory matters, and IP litigation. His client base is international.

For the past seven years he has been named to Lawdragon's list of the 500 Leading Lawyers in America. He has been recognized in *SuperLawyers*, *Best Lawyers in America*, *Chambers Guide to the World's Leading Business Lawyers*, *Benchmark Litigation*, *Euromoney*, *PLC Which Lawyer*, and other guides to the leaders of the legal profession. ACQ Magazine recently named him New York Litigation Lawyer of the Year.

Mr. Molo regularly tries civil and criminal cases before juries and judges throughout the country. He has extensive experience in post-trial and appellate advocacy as well. Chambers and Partners calls him "fantastic in the courtroom"; "fabulous courtroom litigator who lights up the room with his presence." *Benchmark Litigation* – which named him one of the top 100 Trial Lawyers in America – calls him "an outstanding advocate and fearless in court."

He began his career as a prosecutor in Chicago, then practiced with Winston & Strawn where he was a senior litigator and member of that firm's Executive Committee. He spent five and a half years as a litigation partner with the Wall Street firm Shearman & Sterling before founding MoloLamken in October 2009.

He has been involved in some of the most complex legal issues in the U.S. courts over the past 20 years. Frequently, Mr. Molo and the firm are asked to work with other counsel in representing a client after a matter has been pending and the need for additional courtroom experience becomes apparent.

He has represented many directors, CEOs, and other executives in a variety of sensitive matters.

The civil commercial matters he has handled include those involving issues of antitrust, breach of contract, fraud, shareholder rights, structured products and derivatives, insurance, RICO, mergers and acquisitions, real estate, insolvency and restructuring, defamation and privacy, securities, banking, and consumer fraud. His cases frequently involve class actions as well as individual suits. He has testified as an expert on New York commercial law in the High Court of Justice in London.

His criminal matters have included those involving issues of antitrust, mail, wire, bankruptcy and securities fraud, health care fraud, insurance fraud, environmental crimes, obstruction of justice, tax fraud, and other complex crimes. He frequently conducts internal investigations for management, boards, and audit committees. He co-authored the leading treatise, *Corporate Internal Investigations*, and has been recognized as an expert in federal court where he has testified on that topic and corporate prosecutions.

Honors & Awards

Recognized by peer and client review for inclusion in *Best Lawyers in America* (New York: commercial litigation, white collar defense, appeals), *Chambers Guide to the World's Leading Business Lawyers*, *Superlawyers, PLC Which Lawyer?* (highly recommended, New York, disputes), *Euromoney's Guide to the World's Leading White Collar Crime Lawyers*, *Leading Attorneys* (business litigation, white collar criminal defense, antitrust, appeals), *Who's Who in America*, *Who's Who in the Law*, and *Who's Who in Business and Finance*

Named to the *Lawdragon 500 Leading Lawyers in America*, *Benchmark Litigation Top 100 Trial Lawyers in America*

Education

University of Illinois, College of Law, J.D., 1982

University of Illinois, College of Communications, B.S., 1979

LAWYER PROFILES



Steven F. Molo

Mr. Molo also has served as trial counsel in intellectual property matters including patent, trademark, trade dress, trade secret, and copyright cases.

He serves on the editorial advisory board of *Today's General Counsel* and speaks and writes extensively on the subjects of business litigation, corporate criminal liability, and trial and appellate advocacy. He has commented on legal topics for CNN, CNBC, *The Wall Street Journal*, *The New York Times*, the *Chicago Tribune* and other news media. He has taught or lectured at Northwestern University Law School, Loyola University of Chicago Law School, John Marshall Law School, SMU Law School, William & Mary Law School, the University of Illinois College of Law, and the National Institute for Trial Advocacy. He is also co-author and general editor of *Your Witness: Lessons on Cross-Examination and Life from Great Chicago Trial Lawyers*. For five years, he served as counsel to the Illinois Judicial Inquiry Board. He is a fellow of the American Academy of Appellate Lawyers. He is also a fellow of the American Bar Foundation.

Bar and Court Admissions

New York
Illinois
United States Supreme Court
United States Courts of Appeals for the 2nd, 3rd, 4th, 5th, 7th, 9th, 11th, D.C., and Federal Circuits
Solicitor, Law Society of England and Wales
London Court of International Arbitration

LAWYER PROFILES



Steven F. Molo

Representative Matters

- Investors in Residential Mortgage Backed Securities trusts in proceedings to determine the distribution of a \$9 billion settlement among various classes of bondholders
- The former Speaker of the New York Assembly in a federal criminal jury trial on charges of public corruption
- A prominent doctor in a federal criminal jury trial on charges of health care fraud
- Several former NFL players in objecting to the fairness of the class action settlement of the "Concussion Litigation"
- Several trustees and investors in Residential Mortgage Backed Securities trusts in a series of suits to recover for the diminution in the value to the trust as a result of the conduct of the parties originating the mortgage loans
- An Asian government in litigation in the United States and United Kingdom relating to an arbitral award based on a dispute concerning the construction of a power plant and development of a mine
- A senior financial services executive in a federal criminal jury trial on charges of perjury and obstruction of justice
- An inventor in prosecuting claims of patent infringement relating to real-time data technology
- Several groups in successfully challenging New York City's ban on super-sized sugary drinks
- A former pharmaceutical executive in prosecuting a whistleblower claim
- An Israeli pharmaceutical manufacturer in prosecuting a \$4+ billion claim for fraud and breach of contract based on its acquisition of a Mexican company
- A publicly traded media company in litigation relating to a \$1.8 billion debt restructuring
- An investor seeking recovery of \$800 million in losses on a "holder claim" based on the decline in stock value of one of the world's largest banks during the financial crisis
- A former CEO of a publicly traded retailer in defending criminal securities fraud charges
- A former managing director of a leading investment bank in defending criminal securities fraud charges related to the sale of derivatives
- The former CEO of an auto manufacturer in connection with a DOJ investigation of U.S. environmental laws
- A private equity firm in a lawsuit over post-closing purchase price adjustments in connection with the sale of a portfolio company
- A global consulting firm in investigating a senior executive's misconduct
- A CEO of a leading financial services firm in a dispute with a former firm member concerning investments

Publications

Books

- Corporate Internal Investigations
- Your Witness: Lessons on Cross-Examinations and Life *General editor and author*
- Executive's Guide to Understanding the Laws Behind White Collar Crimes *Chapter author*
- Successful Partnering Between Inside and Outside Counsel *Chapter author*
- The Executive's Desk Book on Corporate Risks and Response for Homeland Security *Chapter author*

Recent Articles

- Wrong, maybe. But is it a crime? *Hedgeworld*
- Find a Career, Not a Job *New York Law Journal Magazine*
- To Fight or Not to Fight *New York Law Journal*

LAWYER PROFILES



Steven F. Molo

Representative Matters

- A leading insurance company in investigating fraud by a major vendor and related civil litigation
- A Fortune 500 company in prosecuting a legal malpractice case against an Am Law 50 firm
- A senior executive of a Japanese manufacturing company in a price-fixing investigation conducted jointly by USDOJ and the JFTC
- A CDO management firm in connection with civil litigation and regulatory matters emanating from the global financial crisis
- A private Silicon Valley technology company in a bench trial against one of the world's largest banks based on events arising from an m&a transaction
- An investment bank in obtaining judgment in its favor and the reversal of a \$1.6 billion jury verdict in a suit alleging fraud in connection with its role in a corporate acquisition
- A former senior executive of Bear Stearns in ERISA and securities litigation and related matters
- A former CEO and private equity firm partner in obtaining dismissal of a federal indictment charging securities and bank fraud as well as obstruction of agency proceedings
- A former Foreign Service Officer and West Point graduate in a federal criminal jury trial on charges of bribery and conspiracy to facilitate the issuance of visas in violation of State Department policies
- The former CFO of a publicly traded technology company in a federal criminal jury trial, regulatory, and civil proceedings based on alleged securities and accounting fraud
- A major broker-dealer in a civil jury trial in which a hedge fund claimed fraud in the sale of collateralized mortgage obligations
- A hedge fund in a suit in the Delaware Chancery Court challenging a gate and proposed restructuring of another fund in which it invested
- An entertainment company in a lengthy arbitration involving allegations of 10b-5 violations and other claims following an acquisition
- The world's largest insurance broker in a civil jury trial concerning senior executive compensation
- A leading real estate developer and its lender in a bench trial relating to a dispute with a major tenant
- A lending syndicate in defending multi-billion dollar tort claims and in prosecuting a personal guaranty action against a prominent real estate developer (and reality TV show host) relating to financing of 92-story building in Chicago

Professional Affiliations

American Inns of Court Foundation, Trustee

United States Supreme Court Historical Society, Trustee

New York Inn of Court, Member (Past Vice President, Executive Committee)

Illinois Supreme Court Rules Committee, Member (2004 - 2010)

Seventh Circuit Bar Association (Past President)

Federal Bar Council, Member (Courts Committee)

Chicago Inn of Court, Member (Past President)

American, Illinois, Chicago Bar Association, Member

American Bar Association, Trial Attorney Advisory Board, Member

Association of the Bar of the City of New York, Member

Scribes, The Society of Legal Writers, Member

Economic Club of Chicago, Theodore Roosevelt Association, Member

University of Illinois College of Law Board of Visitors, Member

LAWYER PROFILES



Steven F. Molo

Representative Matters

- Two non-U.S. financial institutions in connection with recovery actions and the defense of claims relating to Madoff
- The Illinois Senate relating to procedures for the impeachment trial of the Governor
- A non-US based insurance holding company in SEC and DOJ investigations into balance sheet fraud through finite reinsurance
- A New York real estate developer in investigating and reporting a ponzi scheme fraud perpetrated by the client's former lawyer, the name partner of a prominent New York firm
- A senior mutual fund executive in an investigation by the SEC and New York Attorney General
- A midwest manufacturing company in an internal investigation and defense of an SEC investigation relating to insider trading
- A CEO in numerous shareholder and derivative actions, parallel SEC proceedings, and a trial before the bankruptcy court relating to allegations of fraud and breach of fiduciary duties following the discovery of accounting irregularities
- The nation's largest bar review course provider in a civil antitrust class action alleging a price-fixing and market allocation conspiracy and a separate civil antitrust class action alleging product tying
- A national insurance company in defending a federal grand jury investigation, state regulatory inquiries, consumer class actions, whistle-blower allegations, and media scrutiny emanating from claims handling practices following a major natural disaster
- A midwest manufacturing company in a DOJ grand jury investigation into price-fixing in the market for certain building supplies
- A publicly traded insurance broker in multiple consumer class actions alleging civil antitrust and RICO violations, as well as Attorneys General and insurance regulatory investigations
- A national retailer in attempted nationwide consumer fraud class actions in multiple forums and Attorney General investigations
- A national publisher and sweepstakes company in an appeal of a class certification order in an attempted consumer class action
- A group of mortgage lenders in an appeal of an order challenging certain lending restrictions
- A major broker-dealer in an appeal in litigation relating to sales practices which resulted in a challenge to certain whistle-blower legislation

LAWYER PROFILES



Steven F. Molo

Representative Matters

- A majority shareholder of a public company in shareholder derivative litigation relating to Revlon duties and change of control
- An investment advisor and mutual fund company in a derivative suit alleging breaches of fiduciary duty relating to fund management
- A global pharmaceutical manufacturer in a federal grand jury investigation and civil litigation emanating from a foreign subsidiary's falsification of information to the FDA
- A internet telephone services provider in patent infringement litigation relating to the company's core technology
- A gaming company in defending allegations of trademark and trade dress infringement in injunction proceedings in the trial court
- A manufacturer of batteries in pursuing copyright, trademark, and trade dress claims relating to a well-known advertising campaign
- A licensor of an agribusiness technology in patent infringement litigation
- A rock star in defending copyright infringement allegations in the trial court and court of appeals
- A major political party in a trial before a three-judge federal district court relating to voter rights and legislative reapportionment issues

Exhibit 2

LAWYER PROFILES



Thomas J. Wiegand

Tom Wiegand is a trial lawyer who represents clients across the country in complex business litigation, class actions, white-collar criminal matters, personal and family trust disputes, antitrust matters, and state and federal government investigations. Mr. Wiegand wrote his third year thesis for Prof. Phillip Areeda, the author of the definitive treatise on antitrust law. After law school Mr. Wiegand worked with the negotiation think tank and consulting business of Prof. Roger Fisher, author of *Getting to Yes*. Mr. Wiegand then gained his litigation and trial experience over 20 years at Winston & Strawn LLP before joining MoloLamken in 2011.

Mr. Wiegand has represented both plaintiffs and defendants in complex business litigation matters involving a wide variety of claims, including common law and UCC contract claims, statutory and common law fraud, fiduciary duty, and myriad federal and state statutory claims, including RICO, TILA, FCRA, the Lanham Act, the Sherman Act, and various securities laws. He also has represented clients in numerous state and federal class actions, including federal classes that are grouped through the federal Multidistrict Litigation Panel, which have involved cutting edge procedural and substantive issues.

Representative Matters

- Obtaining summary judgment on behalf of a national moving company defeating claims in a putative class action under the Motor Carrier Act (*Mervyn v. Nelson Westerberg and Atlas van Lines*, 2016 WL 1270416 (N.D. Ill. Mar. 31, 2016))
- Representing RMBS Trustees in repurchase claims against originators of subprime home mortgage loans based on breaches of representations and warranties
- Obtaining at arbitration an order to refund client's investment in a feature-length film project based on the Pulitzer Prize-winning book *Interpreter of Maladies* (April 2015)
- Representing former NFL athletes in objecting to class settlement re concussions
- Obtaining favorable settlement for professional service firm against group of former employees and their new employer for breach of fiduciary duty
- Obtaining favorable settlement for group of Google employees who were sued by their former employer Groupon relating to a non-compete agreement

Education

Harvard Law School,
J.D., 1986

Yale College, B.A. in
Economics, *magna cum laude* 1983

Honors

Illinois Super Lawyer,
2009-2016

New York Super Lawyer,
2015-2016

Bar and Court Admissions

New York

Illinois

United States Courts of
Appeals for the 2nd,
4th, 5th, 6th, 7th,
11th, and Federal
Circuits

Professional Affiliations

Board of Governors,
Seventh Circuit Bar
Association

Member, CPLR
Committee of the NY
State Bar Association

Member, Chicago Inn of
Court

Member, American Bar
Association Litigation
Section

Served on the board of
the Antitrust and
Unfair Competition
Section of the Illinois
State Bar Association

Serves on Board of Yale
Crew Association

Served as a board
member of Over the
Rainbow Association
and of Joseph Sears
School

LAWYER PROFILES



Thomas J. Wiegand

Representative Matters (cont.)

- Obtaining favorable settlement against ad agency and its client that infringed Car Freshner's famous trademarks
- Defeating motion for class certification of a set of consolidated class actions involving the recall by the CPSC of over 4 million units of a children's arts and crafts toy (*In re Aqua Dots Products Liability*, 270 F.R.D. 377 (N.D. Ill. 2010))
- Defeating named plaintiffs' motion for class certification involving claims of cyber-squatting relating to domain names on the Internet (*Vulcan Golf LLC v. Google Inc.*, 254 F.R.D. 521 (N.D. Ill. 2008))
- Winning summary judgment dismissing the claims against all named plaintiffs seeking to represent a putative class of home equity borrowers in Alameda County, California, against a consumer finance company
- Winning dismissal of the claims of a putative class action relating to accessing credit report information to advertise for loans (*Zawacki v. Discover Financial Services*, 2007 WL 625454 (N.D. Ill. 2007))
- Winning summary judgment dismissing all claims brought against UOP LLC by Archer Daniels Midland Company on UCC warranty theories
- Obtaining dismissal of a consumer class action against DaimlerChrysler in Cook County, Illinois (*Evitts v. DaimlerChrysler*, 834 N.E.2d 942)
- Defending Lear Corporation in federal court jury trial over a \$75 million contract claim by a supplier
- Obtaining summary judgment against plaintiffs in Jefferson County, Mississippi, on behalf of a consumer finance company in a "mass joinder" fraud action
- Obtaining dismissal by the court of a federal RICO count at the conclusion of a six-week criminal trial (*U.S. v. Serpico*, 2001 WL 803703)
- Representing Sears, Roebuck and Co. in several putative national consumer class action lawsuits and state attorney general investigations (including *Poe v. Sears*, 1998 WL 113561; *Kelly v. Sears*, 720 N.E.2d 683; and *Feuerman v. Sears*, 1996 WL 648966)
- Representing Reader's Digest in its successful Illinois appeal that reversed a trial court's class certification decision
- Representing Interstate Brands in a 22-state product recall of Twinkies and other snack cakes due to allegations of improper asbestos removal from the bakery (including class actions and government investigations)

LAWYER PROFILES



Thomas J. Wiegand

Representative Matters (cont.)

- Successfully representing Interstate Brands in a DOJ antitrust division contest of the 1995 acquisition of Continental Baking
- Defending Gateway, Inc. in a putative national class action of purchasers of a certain PC configuration, which concluded successfully when the trial court's certification of a nationwide class was overridden by the Seventh Circuit's direction that an arbitration clause had to be enforced and that a class arbitration was not permissible (*Hill v. Gateway*, 105 F.3d 1147).

LAWYER PROFILES



Martin V. Totaro

Martin Totaro focuses his practice on all aspects of appellate litigation in the federal courts of appeals and the U.S. Supreme Court. He also assists clients with motions practice and issue analysis at the trial level. He has represented corporations in various industries, business associations, individual criminal defendants, and veterans.

Prior to joining MoloLamken, Mr. Totaro was an associate at Baker Botts. He also served as law clerk to the Honorable D. Brooks Smith of the United States Court of Appeals for the Third Circuit.

Representative Matters

- Major energy corporation in merits-stage briefing in the U.S. Supreme Court in a case involving the requirements for class certification in a securities fraud suit
- Group of leading corporations in amicus briefs in the U.S. Supreme Court at the certiorari- and merits-stage in a case involving the standard for class certification pursuant to Federal Rule of Civil Procedure 23(a)
- Group of 14 public pension funds and an association of over 120 pension funds in an amicus brief in the D.C. Circuit in a case involving SEC proxy access rules
- Instrumentality of a foreign government in certiorari-stage briefing in the U.S. Supreme Court in a case involving the scope of the Terrorism Risk Insurance Act of 2002
- Individual criminal defendant in district court litigation involving alleged violations of the Federal Election Campaigns Act
- Professional association of federal judges in an amicus brief in the U.S. Supreme Court in a case involving the U.S. Constitution's Compensation Clause
- Major energy corporation in certiorari-stage briefing in the U.S. Supreme Court in a case involving the due-process limits to punitive damages
- Major competitive local exchange carrier in a certiorari-stage briefing in the U.S. Supreme Court in a case involving reciprocal compensation requirements of the 1996 Telecommunications Act
- Vietnam veteran in the U.S. Court of Appeals for the Federal Circuit in a case involving denial of veteran's benefits; in the Federal Circuit as amicus in a case raising the same legal issue (briefed and argued); and in the U.S. Supreme Court as counsel of record, filing an amicus brief on his behalf

Clerkships

Law clerk to the Honorable D. Brooks Smith, United States Court of Appeals for the Third Circuit

Education

University of Virginia School of Law, J.D., 2006

Articles Editor, *Virginia Law Review*

University of Chicago, M.A., 2003

State University of New York at Binghamton, B.A., 2002

Summa cum laude

Bar and Court Admissions

District of Columbia

Virginia

United States Courts of Appeals for the 3rd, 4th, and Federal Circuits

United States District Court for the Eastern District of Texas

Publications

"Local Jurisdiction over Foreign Companies," Executive Counsel, 2012 (with Robert K. Kry)

"Legal Positivism, Constructivism, and International Human Rights Law," *Virginia Journal of Int'l Law*, 2008

Book Review, "The Other Path of Neoconservatism," *Virginia Journal of Int'l Law*, 2007

Note, "Modernizing the Critique of Per Diem Pain and Suffering Damages," *Virginia Law Review*, 2006

Professional Affiliations

Member, Edward Coke Appellate Inn of Court

LAWYER PROFILES



Eric R. Nitz

Eric Nitz's practice focuses on white collar criminal investigations, complex civil litigation, patent litigation, and appellate litigation. He has represented senior governmental and corporate officials in investigations by the Department of Justice, various inspectors general, and Congress. He has briefed appeals before the Federal, Third, and D.C. Circuits. He has drafted dispositive and evidentiary motions in district courts across the country.

Prior to joining MoloLamken, Mr. Nitz served as a law clerk to the Honorable Joel M. Flaum of the United States Court of Appeals for the Seventh Circuit. He also worked as an associate in the Washington, D.C. office of Winston & Strawn LLP.

Before attending law school, Mr. Nitz was a high school science teacher and assistant track and field coach.

Criminal and Congressional Investigations

- Secret Service official in parallel investigations by Congress and Department of Homeland Security into handling of White House security breach
- Department of Homeland Security official in connection with investigation into Anti-Deficiency Act violation
- Employees of large software company in connection with accounting fraud and securities fraud investigations by DOJ and SEC
- Senior Department of Veterans Affairs official in connection with parallel investigations by Congress, DOJ, and the Department of Veterans Affairs inspector general
- Senior executive branch official in connection with gratuities and false statements investigation by DOJ
- Senior Department of Veterans Affairs official in connection with inspector general investigation into improper contracting practices
- Senior IRS official in connection with inspector general investigation regarding improper use of government information technology
- Former senior National Weather Service official in connection with congressional investigation into allegations of conflict-of-interest
- Senior ATF official in connection with Department of Justice inspector general investigation into disclosure of ATF documents
- Senior OPM official in connection with congressional investigation into data breach of the federal government
- High-ranking political operative in connection with Department of Justice investigation into allegations of wire fraud

Clerkships

Law clerk to the Honorable Joel M. Flaum, United States Court of Appeals for the Seventh Circuit

Education

Georgetown University Law Center, J.D., 2011, *magna cum laude*

Order of the Coif

The Georgetown Law Journal

Leahy Moot Court Competition, 2009, Finalist

National First Amendment Moot Court Competition, 2010, Quarterfinalist

Georgetown University, M.P.P., 2011

University of Notre Dame, M.Ed., 2007

University of Notre Dame, B.S., 2007, *magna cum laude*, biological sciences

Bar and Court Admissions

District of Columbia
Virginia

United States Supreme Court

United States Courts of Appeals for the 7th, D.C., and Federal Circuits

United States District Courts for the District of Columbia and the Eastern District of Virginia

LAWYER PROFILES



Eric R. Nitz

Complex Civil and Patent Litigation

- Large Middle Eastern aviation support company in multidistrict tort litigation
- Retired NFL football players objecting to class action settlement in multidistrict tort litigation
- IRS officials in constitutional tort action under *Bivens* involving alleged violations of the First Amendment and Fifth Amendment
- Small laundry detergent manufacturer and patent holder in multiple patent infringement lawsuits

Appellate Matters

- *Cot'n Wash v. The Sun Products Corp.*, No. 14-1805 (Fed. Cir.) – Drafted briefs on behalf of patent licensee in appeal from claim construction ruling
- *In re NFL Players Concussion Litigation*, No. 15-2304 (3d Cir.) – Drafted briefs challenging final approval of class action settlement
- *Linchpins of Liberty v. United States*, No. 15-5013 (D.C. Cir.) – Drafted briefs successfully defending dismissal of *Bivens* action brought against IRS official
- *True the Vote v. IRS*, No. 14-5316 (D.C. Cir.) – Drafted briefs and presented oral argument successfully defending dismissal of *Bivens* action brought against IRS officials
- *Helman v. Department of Veterans Affairs*, No. 15-3086 (Fed. Cir.) – Drafted briefs and presented oral argument challenging the constitutionality of the Veterans Access, Choice, and Accountability Act under the Appointments Clause
- *Drone Technologies, Inc. v. Parrot S.A.*, No. 15-1892 (Fed. Cir.) – Drafted briefs on behalf of defendant drone manufacturer in successful appeal from default judgment and damages trial for patent infringement

Publications

*Navigating Overseas
Discovery: Beware
the Dangers of
Foreign Law*, Nat'l
L.J., May 20, 2014
(with Robert K. Kry)

*Note, Comparing Apples
to Apples: A
Federalism-Based
Theory for the Use of
Founding-Era State
Constitutions To
Interpret the
Constitution*, 100
Geo. L.J. 295 (2011)

LAWYER PROFILES



Kaitlin R. O'Donnell

Kaitlin O'Donnell's practice focuses on complex civil litigation, white collar matters, and appellate litigation.

Prior to joining MoloLamken, Ms. O'Donnell served as a law clerk to the Honorable Juan R. Torruella of the United States Court of Appeals for the First Circuit. She also served as a law clerk to the Honorable Joseph F. Bianco of the United States District Court for the Eastern District of New York. Before her clerkships, Ms. O'Donnell was an associate with the Boston office of Choate Hall & Stewart LLP, worked with the Argentine law firm of M. & M. Bomchil, and served as a research assistant for Professor William W. Park, an international arbitrator. Ms. O'Donnell is fluent in Spanish and Portuguese.

Clerkships

Law clerk to the
Honorable Juan R.
Torruella, United
States Court of
Appeals for the First
Circuit

Law clerk to the
Honorable Joseph F.
Bianco, United States
District Court for the
Eastern District of
New York

Education

Boston University School
of Law, J.D., 2009,
cum laude

*Edward F. Hennessey
Distinguished Scholar*

*Managing Editor, Boston
University
International Law
Journal*

*Second Place Best
Oralist, Northeast
Super Regional, Philip
C. Jessup
International Law
Moot Court
Competition*

*Frankfurt Investment
Arbitration Moot
Court Team*

Georgetown University,
M.S. 2006

Phi Beta Kappa

Georgetown University,
B.A. 2005, *magna
cum laude*

*John Carroll Scholar
Portuguese Honor
Society*

**Bar and Court
Admissions**

California

Massachusetts

New York

United States Court of
Appeals for the 1st
Circuit

United States District
Courts for the District
of Massachusetts,
Southern District of
New York, and
Eastern District of
New York

LAWYER PROFILES



Rayiner Hashem

Rayiner Hashem's practice focuses on complex civil litigation and patent litigation.

Mr. Hashem has served as a law clerk to the Honorable Dolores K. Sloviter of the United States Court of Appeals for the Third Circuit. During law school, he also served as law clerk to former Commissioner Meredith A. Baker of the Federal Communications Commission.

Mr. Hashem holds a B.S. in Aerospace Engineering from the Georgia Institute of Technology. Before attending law school, he was a software engineer at a wireless technology R&D firm.

Clerkships

Law clerk to the
Honorable Dolores K.
Sloviter, United
States Court of
Appeals for the Third
Circuit

Education

Northwestern University
School of Law, J.D.,
2012, *magna cum
laude*

*Associate Editor,
Northwestern Journal
of Technology and
Intellectual Property*

Georgia Institute of
Technology, B.S.,
2007

Bar and Court Admissions

New York

Illinois

District of Columbia,
admission pending
(practicing under
Rule 49(c)(8))

Exhibit 3

Summary of Issues Raised by Objectors Represented by Counsel

Table 1 below lists the issues raised by all objectors who were represented by counsel.¹ The issues that were addressed – at least in part – by the Final Settlement are identified in bold. Counsel for each objector or objector group are listed in Table 2.

Table 1: Summary of Issues

Issue/Argument	Objector(s) Who Raised the Issue/Argument
Insufficient \$75-Million BAP Cap	<i>Faneca</i> , Duerson
Failure To Credit NFL Europe Play	<i>Faneca</i> , Alexander, Heimburger, Jones, Slack
Failure To Compensate CTE After the Date of Preliminary Approval	<i>Faneca</i> , Alexander, Armstrong, Chesley, Duerson, Jones, Miller
Unfairness of Appeals Process	<i>Faneca</i> , Alexander, Armstrong, Duerson
Unavailability of Medical Records Due to <i>Force Majeure</i> Events	Williams
Burdensome Process for BAP Participation	<i>Faneca</i> , Armstrong
Burdensome Process for Filing Claims	<i>Faneca</i> , Alexander, Armstrong Heimburger, Komlo
Improper and Underinclusive Test Battery	<i>Faneca</i> , Armstrong, Duerson
75% Reductions for Stroke or non-NFL TBI	<i>Faneca</i> , Alexander, Armstrong, Barber, Duerson
Failure To Compensate Mood and Behavioral Symptoms of MTBI	<i>Faneca</i> , Armstrong, Barber, Duerson, Heimburger
Lack of Discovery and Lack of Evidentiary Support for the Settlement	<i>Faneca</i> , Alexander, Armstrong, Duerson
Inadequate Notice	<i>Faneca</i> , Alexander, Duerson, Heimburger, Miller, Morrison
Settlement Freezes Science in Place	<i>Faneca</i> , Alexander, Armstrong, Duerson
Clear-Sailing Provision and Excessive Attorneys' Fees	<i>Faneca</i> , Alexander, Armstrong, Heimburger, Miller
Award Reductions for Age and Career Length	Alexander, Armstrong, Barber, Duerson
Compensation Depends on Date of Diagnosis Instead of Date of Onset of Symptoms	Barber, Duerson, Owens
Education Fund Is a <i>Cy Pres</i> Award	Alexander, Armstrong, Heimburger
Underinclusive "Eligible Seasons" Definition	Slack, Stewart
Insufficient Maximum Monetary Awards	Alexander, Armstrong

Issue/Argument	Objector(s) Who Raised the Issue/Argument
Inadequate Opt-Out Procedure	Duerson, Utecht
Failure To Compensate Other MTBI-Related Diseases (<i>e.g.</i> Epilepsy or Multiple Sclerosis)	Duerson
Settlement Agreement Is Vague/Ambiguous	Alexander, Utecht
Failure To Account for Tolling of Statute of Limitations	Kinard, Williams
Class Lacks Typicality	Heimbarger
Lack of Security for NFL's Payment Obligations	Utecht
Arbitrary Limit on Wrongful Death Damages	Duerson

¹ Objections were filed by counsel on behalf of: Liyongo Alexander *et al.* (Dkt. 6237), Ramon Armstrong *et al.* (Dkts. 6233, 6503), Michael Barber *et al.* (Dkt. 6226), Aloyouis Chesley *et al.* (Dkts. 6242, 6453), David Duerson *et al.* (Dkts. 6241, 6456), Craig and Dawn Heimbarger (Dkt. 6230), James Jax (Dkt. 6236), Preston and Katherine Jones (Dkt. 6235), Frank Kinard (Dkt. 6219), Williams Komlo (Dkt. 6222), Cleo Miller *et al.* (Dkts. 6213, 6452, 6484), Susan Owens (Dkt. 6210), Reginald Slack and Matthew Rice (Dkt. 6223, 6431), Andrew Stewart (Dkt. 6175), Benjamin Utecht (Dkts. 6243, 6437), and Delano Williams (Dkts. 6221, 6433). Many objections incorporated the Faneca Objectors' filings by reference. *See* Dkt. 6237 at 4 (Alexander); Dkt. 6242 at 6 n.4 (Chesley); Dkt. 6241 at 34 (Duerson); Dkt. 6230 at 7-8 (Heimbarger); Dkt. 6235 at 2 (Jones); 6213 at 1 (Miller). The table above lists only issues or arguments raised directly by each objector.

Table 2: Counsel for Objectors

Objector(s)	Law Firm(s)	Lead Attorney(s)
Liyongo Alexander <i>et al.</i>	Lubel Voyles LLP, Washington & Associates PLLC, McGinnis Featherston & Canady	Lance H. Lubel, Adam Voyles, Mickey Washington
Ramon Armstrong <i>et al.</i>	Coffman Law Firm	Richard L. Coffman
Michael Barber <i>et al.</i>	Edward Stone Law PC	Marc Davies
Aloyouis Chesley <i>et al.</i>	Zuckerman Spaeder LLP	Dwight P. Bostwick
David Duerson <i>et al.</i>	Corboy & Demetrio, PC	Thomas A. Demetrio, William Gibbs
Craig and Dawn Heimburger		Glenn Manochi, Gary Lightman
James Jax	Boesen Law, LLC	Christopher K. Gilbert
Preston and Katherine Jones	Capretz & Associates	Don K. Ledgard
Frank Kinard	Klamann Law Firm, Humphrey Farrington & McClain, The Popham Law Firm	Paul D. Anderson
Williams Komlo	The Shah Law Firm	Parag Shah
Cleo Miller <i>et al.</i>		John J. Pentz
Susan Owens	Edward Stone Law PC	Marc Davies
Reginald Slack and Matthew Rice	The Shah Law Firm	Parag Shah
Andrew Stewart	Rosenthal Lurie LLC	Michael Rosenthal
Benjamin Utecht	Guardian Law Group LLC	Scott D. Hillstrom
Delano Williams	The Shah Law Firm	Parag Shah

Exhibit 4

LAWYER PROFILES



Jeffrey A. Lamken

Jeffrey Lamken, a nationally recognized appellate practitioner, has argued 22 cases before the U.S. Supreme Court and briefed dozens more on a wide range of topics, including administrative law, the First Amendment, antitrust, bankruptcy, civil rights, criminal procedure, energy, intellectual property, searches and seizures, separation of powers, and telecommunications. He has also handled matters in virtually all the federal courts of appeals and many state appellate courts. Mr. Lamken also develops, briefs, and argues critical motions in significant trial matters.

Before founding MoloLamken, Mr. Lamken headed Baker Botts' Supreme Court and Appellate Practice in Washington, D.C. Mr. Lamken has served as an Assistant to the Solicitor General in the U.S. Department of Justice, and was a partner in the Washington D.C. litigation boutique Kellogg Huber & Hansen.

Since 2005, Mr. Lamken has been recognized each year by Chambers & Partners Guide of America's Leading Business Lawyers (Nationwide) as a top appellate practitioner. The 2015 edition calls him a "really outstanding" practitioner, who is "incredibly knowledgeable and quick to understand issues," noting that "he is a fierce advocate" with a "very detailed" approach. The 2014 edition describes him as "a real leading player — a superstar lawyer." In the 2011 edition, peers lauded Mr. Lamken as "a wonderfully talented appellate lawyer" and "a joy to work with."

Selected Cases Argued Before the United States Supreme Court

- *Hasty v. Abbasi*, No. 15-1363 (to be argued Jan. 18, 2017) (whether a Bureau of Prisons associate warden may be liable for constitutional torts under *Bivens* for alleged violations of free exercise, due process, equal protection, and unreasonable searches)
- *Bank Markazi v. Peterson*, 136 S. Ct. 1310 (2016) (whether a statute that effectively directs a particular result in a single pending case violates the separation of powers)
- *First Am. Fin. Corp. v. Edwards*, cert. dismissed as improvidently granted, 132 S. Ct. 2536 (2012) (representing respondent) (whether Section 8 of the Real Estate Settlement Procedures Act of 1974 gives purchasers standing to sue title insurers under Article III, § 2 of the U.S. Constitution absent an allegation that the title insurers' statutory violations had any impact on the price or quality of the services)
- *Mac's Shell Serv., Inc. v. Shell Oil Prods. Co. LLC*, 559 U.S. 175 (2010) (whether a franchisee may recover for "constructive termination" or "constructive nonrenewal" under the Petroleum Marketing Practices Act when the franchisee continues to operate the franchise)
- *Free Enter. Fund v. Pub. Co. Accounting Oversight Bd.*, 561 U.S. 477 (2010) (whether the Sarbanes-Oxley Act, which created the Public Company Accounting Oversight Board, violates separation of powers or the Appointments Clause of Constitution)
- *NRG Power Mktg., LLC v. Maine Pub. Utils. Comm'n*, 558 U.S. 165 (2010) (whether the *Mobile-Sierra* doctrine, which protects the integrity of wholesale energy contracts, applies when a rate set by contract is challenged by an entity that was not a party to the contract)
- *BP Am. Prod. Co. v. Burton*, 549 U.S. 84 (2006) (whether the limitations period in 28 U.S.C. § 2415(a) applies to federal agency orders requiring the payment of money claimed under a lease or other agreement)

Honors & Awards

Recognized as a leading appellate practitioner, *Chambers USA Guide to America's Leading Business Lawyers*, 2005-2015 (appellate)

Listed in *The Best Lawyers in America*, 2006-2015

Recognized as a "Washington D.C. Super Lawyer" by *Law & Politics*, 2007-2015

Named to the "Fab Fifty" list of 50 most promising young litigators under 45 by *American Lawyer*, 2007

Washingtonian Top Lawyers 2007, 2009, 2011-2014

Named to the *LawDragon* 500 Leading Lawyers in America

Clerkships

Law clerk to the Honorable Sandra Day O'Connor, United States Supreme Court

Law clerk to the Honorable Alex Kozinski, United States Court of Appeals for the Ninth Circuit

Education

Stanford Law School, J.D., 1990

Nathan Abbott Scholar

Order of the Coif

Senior Editor, *Stanford Law Review*

Haverford College, B.A., 1986, *magna cum laude*, political science

Dep't Prize in Mathematics

Phi Beta Kappa

Kurzman Prize

LAWYER PROFILES



Jeffrey A. Lamken

Selected Party Briefs in the United States Supreme Court

- *Mohamad v. Palestinian Auth.*, 132 S. Ct. 1702 (2012) (whether the term “individual” in the Torture Victim Protection Act limits suits to natural persons)
- *Erica P. John Fund, Inc. v. Halliburton Co.*, 131 S. Ct. 2179 (2011) (whether private securities fraud plaintiffs must prove loss causation to obtain class certification)
- *Jones v. Harris Assocs.*, 559 U.S. 335 (2010) (establishing the standard for determining whether an investment adviser’s fees violate its statutory fiduciary duty to the fund it manages)

Selected Amicus Briefs in the United States Supreme Court

- *Comptroller v. Wynne*, 135 S. Ct. 1787 (2015) (brief of amicus curiae U.S. Chamber of Commerce addressing whether a State can tax its residents on out-of-state income without providing a credit for out-of-state taxes)
- *Am. Broad. Cos. v. Aereo, Inc.*, 134 S. Ct. 2498 (2014) (brief of amicus curiae Cablevision Systems Corp. in a copyright challenge to Aereo’s Internet television retransmission service)
- *Nautilus, Inc. v. Biosig Instruments, Inc.*, 134 S. Ct. 2120 (2014) (brief of amicus curiae Yahoo! Inc. and other high-tech companies addressing the degree of particularity required for patent claims)
- *Alice Corp. Party Ltd. v. CLS Bank Int’l*, 134 S. Ct. 2347 (2014) (brief of amici curiae Microsoft Corporation, Adobe Systems Inc., and Hewlett-Packard Company addressing the patent eligibility of computer-implemented inventions under § 101 of the Patent Act)
- *Octane Fitness, LLC v. Icon Health & Fitness, Inc.*, 134 S. Ct. 1749 (2014), & *Highmark Inc. v. Allcare Health Management Systems Inc.*, 134 S. Ct. 1744 (2014) (brief of amici curiae Yahoo! Inc. and other high-tech companies addressing the “exceptional case” standard for fee-shifting under § 285 of the Patent Act)
- *EPA v. EME Homer City Generation, LP*, 133 S. Ct. 2857 (2013) (brief of amicus curiae Chamber of Commerce in a suit challenging the EPA’s rules implementing the interstate pollution restrictions of the Clean Air Act)
- *Ass’n for Molecular Pathology v. Myriad Genetics*, 133 S. Ct. 2107 (2013) (brief of amicus curiae The Coalition for 21st Century Medicine addressing the patent eligibility of isolated human DNA under § 101 of the Patent Act)
- *Genesis HealthCare Corp. v. Symczyk*, 133 S. Ct. 1523 (2012) (brief of amicus curiae DRI — The Voice of the Defense Bar addressing whether a case becomes moot, and thus beyond the judicial power of Article III, when the lone plaintiff is offered a payment that would satisfy all of the plaintiff’s claims)

Bar and Court Admissions

District of Columbia
California
United States Supreme Court
United States Courts of Appeals for the 1st, 2nd, 3rd, 4th, 5th, 6th, 7th, 8th, 9th, 10th, 11th, D.C., and Federal Circuits
United States District Courts for the District of Columbia, the Northern District of California, and the Eastern District of Texas

Professional Affiliations

American Academy of Appellate Lawyers
Member, Edward Coke Appellate Inn of Court
Member, American Bar Association Litigation Section

LAWYER PROFILES



Jeffrey A. Lamken

Selected Amicus Briefs in the United States Supreme Court (continued)

- *Wal-Mart Stores, Inc. v. Dukes*, 131 S. Ct. 2541 (2011) (brief of amici curiae Altria Group and other leading U.S. companies addressing the need for significant proof of a general policy of discrimination to certify an employment-discrimination class action)
- *Altria Grp. v. Good*, 555 U.S. 70 (2008) (brief of amicus curiae Chamber of Commerce addressing whether federal law preempts state-law fraud challenges to FTC-authorized statements in cigarette advertising)
- *Morgan Stanley Capital Grp. v. Pub. Util. Dist. No. 1 of Snohomish County*, 554 U.S. 527 (2008) (brief of amici curiae economics professors addressing the standard for abrogation of long-term energy contracts under *Mobile-Sierra* doctrine)
- *Weyerhaeuser Co. v. Ross-Simmons Hardwood Lumber Co.*, 549 U.S. 312 (2007) (brief of amici curiae timberland owners and managers addressing whether predatory-bidding antitrust claims require proof of recoupment)

Representative Matters in the Courts of Appeals

- *Drone Techs., Inc. v. Parrot S.A. and Parrot Inc.*, 838 F.3d 1283 (Fed. Cir. 2016) (whether the district court abused its discretion in entering a default judgment on liability as a discovery sanction)
- *McRo, Inc. v. Bandai Namco Games Am., Inc.*, 837 F.3d 1299 (Fed. Cir. 2016) (whether a patent for automatically animating the lip synchronization and facial expressions of animated characters was directed at an unpatentable abstract idea)
- *Rubin v. Islamic Rep. of Iran*, 830 F.3d 470 (7th Cir. 2016) (whether 28 U.S.C. §1610(g) provides a freestanding attachment immunity exception; whether 28 U.S.C. §1610(a) applies to a foreign sovereign's property located in the United States only when the property is used by the foreign state itself)
- *Hourani, et al. v. Mirtchev, et al.*, 796 F.3d 1 (D.C. Cir. 2015) (whether the Racketeering Influenced and Corrupt Organizations Act extends to alleged conspiracy to commit extortion abroad)
- *Versata Dev. Grp., Inc. v. SAP Am., Inc.*, 793 F.3d 1306 (Fed. Cir. 2015) (whether the Patent and Trademark Office properly defined covered business method patents subject to transitional review proceedings; whether claim preclusion applies in such proceedings; and whether patent for a computerized pricing engine is directed to patent-eligible subject matter)
- *Turkmen v. Hasty*, 789 F.3d 218 (2d Cir. 2015) (whether a Bureau of Prisons associate warden may be liable for constitutional torts under *Bivens* for alleged violations of free exercise, due process, equal protection, and unreasonable searches)
- *Soverain Software LLC v. Victoria's Secret*, 778 F.3d 1311 (Fed. Cir. 2015) (whether appellate decision *sua sponte* holding patent claims invalid has issue-preclusive effect in later litigation)
- *United States ex rel. Nathan v. Takeda Pharm. N. Am., Inc.*, 707 F.3d 451 (4th Cir. 2013) (whether pharmaceutical company's promotion of a drug for off-label purposes caused false claims to be presented to the government in violation of the False Claims Act), cert. denied, 134 S. Ct. 1759 (2014)

LAWYER PROFILES



Jeffrey A. Lamken

Representative Matters in the Courts of Appeals (continued)

- *Rambus Inc. v. Rea*, 527 F. App'x 902 (Fed. Cir. 2013) (whether substantial evidence supports Patent and Trademark Office finding that 25 patent claims were anticipated by an earlier patent)
- *Beer v. United States*, 696 F.3d 1174 (Fed. Cir. 2012) (en banc) (brief of amicus curiae Federal Judges Association addressing cost-of-living adjustments for Article III judges), cert. denied, 133 S. Ct. 1997 (2013)
- *United States v. Danielczyk*, 683 F.3d 611 (4th Cir. 2012) (whether, following *Citizens United*, the Federal Election Campaign Act's categorical ban on corporate contributions to candidates violates the First Amendment), cert. denied, 133 S. Ct. 1459 (2013)
- *Therasense, Inc. v. Becton, Dickinson & Co. and Bayer Healthcare LLC*, 649 F.3d 1276 (Fed. Cir. 2011) (en banc) (whether the elements of inequitable conduct should be made more exacting with respect to intent, materiality, and causation, and by excluding a "balancing" approach)
- *Tivo Inc. v. Echostar Corp.*, 646 F.3d 869 (Fed. Cir. 2011) (en banc) (brief of amicus curiae Association for Competitive Technology addressing the standard for judicial enforcement of patent injunctions)
- *Arar v. Ashcroft*, 585 F.3d 559 (2d Cir. 2009) (en banc) (whether *Bivens* and the Torture Victim Prevention Act allow a foreign national claiming to have been tortured by foreign officials abroad to sue U.S. officials for alleged complicity), cert. denied, 560 U.S. 978 (2010)
- *Cartoon Network LP v. CSC Holdings, Inc.*, 536 F.3d 121 (2d Cir. 2008) (whether cable company's remote-storage DVR infringes appellees' copyrights by allowing customers to record programming and store their recordings in a remote location), cert. denied, 129 S. Ct. 2890 (2009)
- *AES Sparrow Point LNG, LLC v. Smith*, 527 F.3d 120 (4th Cir. 2008) (whether county law making it illegal to build a liquefied natural gas terminal in a particular location is preempted by the Natural Gas Act), cert. denied, 555 U.S. 888 (2008)
- *Kirch v. Liberty Media Corp.*, 449 F.3d 388 (2d Cir. 2006) (whether statements about a third-party can support a defamation claim and whether plaintiff proved claims of tortious interference with contract and prospective economic advantage)

Exhibit 5

Summary of Time and Fees

MoloLamken LLP					
Reporting Period: September 3, 2013 - November 30, 2016					
Timekeeper	Professional Level	Total Hours	Rate	Total Billing Amount	
Molo, Steven	PT	723.6	\$1,250	\$904,500.00	
Lamken, Jeffrey	PT	9.0	\$1,000	\$9,000.00	
Wiegand, Tom	PT	1,253.8	\$900	\$1,128,420.00	
Kry, Robert	PT	7.6	\$900	\$6,840.00	
Pattillo, Michael	PT	16.7	\$825	\$13,777.50	
DeVooght, Andrew	PT	15.6	\$825	\$12,870.00	
Totaro, Martin	PT	623.6	\$825	\$514,470.00	
Quarmby, Ben	PT	78.2	\$825	\$64,515.00	
Weiner, Justin	A	94.4	\$625	\$59,000.00	
Bernie, Andrew	A	11.5	\$625	\$7,187.50	
Ellis, Justin	A	7.4	\$625	\$4,625.00	
Melendez, Joel	A	2.0	\$625	\$1,250.00	
Nitz, Eric	A	1,089.3	\$495	\$539,203.50	
O'Donnell, Kaitlin	A	590.1	\$495	\$292,099.50	
Hashem, Rayiner	A	486.5	\$495	\$240,817.50	
Shah, Hassan	A	24.5	\$495	\$12,127.50	
Deininger, Emily	A	17.2	\$495	\$8,514.00	
Walker, Lucas	A	12.1	\$495	\$5,989.50	
Michaeli, Daniel	A	6.1	\$495	\$3,019.50	
Barta, James	A	4.7	\$495	\$2,326.50	
Weinstein, Lauren	A	4.5	\$495	\$2,227.50	
Klein, Jeff	A	211.9	\$425	\$90,057.50	
DeMaio, Stephen	A	99.0	\$425	\$42,075.00	
Sivakumaran, Gajan	A	58.7	\$425	\$24,947.50	
Swanson, Amanda	PR	154.1	\$195	\$30,049.50	
Atkins, Sarah	PR	141.1	\$195	\$27,514.50	
Havriliak, Anya	PR	119.6	\$195	\$23,322.00	
Caros, Nicholas	PR	37.9	\$195	\$7,390.50	
Graylin, Jack	PR	30.0	\$195	\$5,850.00	
Molo, Julia	PR	16.0	\$195	\$3,120.00	
Hine, Nicholas	PR	14.6	\$195	\$2,847.00	
Chung, Tammy	PR	13.9	\$195	\$2,710.50	
Che, Erica	PR	11.7	\$195	\$2,281.50	
Smith, Michael	PR	6.3	\$195	\$1,228.50	

At MoloLamken, attorneys at the \$425/hour billing rate are known as "discovery counsel." Discovery counsel are full-time lawyers, employed by the firm, whose duties focus primarily on fact research as well as discovery and evidentiary issues.

Summary of Time and Fees

Timekeeper	Professional Level	Total Hours	Rate	Total Billing Amount
Figuerdo, Juan Carlos	PR	5.9	\$195	\$1,150.50
Collins, Nicholas	PR	1.6	\$195	\$312.00
Lew, Katherine	PR	1.5	\$195	\$292.50
Makama, Mfundu	PR	1.5	\$195	\$292.50
Kalpin, Christine	PR	0.5	\$195	\$97.50
Total:		6,004.2		\$4,098,319.00

Exhibit 6

Summary of Time and Fees by Task

	MoloLamken LLP
Reporting Period:	September 3, 2013 - November 30, 2016

Task Category	Total Hours	Total Billing Amount
(1) Discovery	0	\$0.00
(2) PSC Calls/Meetings	0	\$0.00
(3) Lead Counsel/PSC Duties	0	\$0.00
(4) Administrative	0	\$0.00
(5) MDL Status Conference	0	\$0.00
(6) Court Appearance	65.5	\$44,857.50
(7) Research	1041.3	\$583,905.50
(8) Litigation Strategy & Analysis	774	\$617,752.00
(9) Pleadings/Briefs/Pre-trial Motions/Legal	2368.1	\$1,555,393.50
(10) Experts/Consultants	305.2	\$267,247.50
(11) Settlement	112.3	\$106,926.00
(12) Appeal	1335.3	\$921,749.50
(13) Miscellaneous	2.5	\$487.50
Total:	6004.2	\$4,098,319.00

Exhibit 7

Summary of Expenses

	MoloLamken LLP
Reporting Period:	September 3, 2013 - November 30, 2016

Type of Expense	Total Expenses
(1) Fees	\$920.32
(2) Federal Express/Local Courier, etc.	\$0.00
(3) Postage Charges	\$0.00
(4) Fascimile Charges	\$0.00
(5) Long Distance/Conference Calls	\$0.00
(6) In-House Document Reproduction	\$0.00
(7) Outside Document Reproduction	\$8,920.78
(8) Lodging/Hotels	\$6,649.85
(9) Dining/Meals	\$271.11
(10) Mileage	\$121.00
(11) Air Travel	\$2,868.90
(12) Ground Transportation	\$6,968.26
(13) Legal Research/Lexis/Westlaw	\$0.00
(14) Miscellaneous (litigation support, graphics, articles/books, supplies for hearing)	\$21,263.14
Total:	\$47,998.52

Exhibit 8

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB
MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Civil Action No. 2:14-cv-00029-AB

Plaintiffs,

v.

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**DECLARATION OF WILLIAM T. HANGLEY IN SUPPORT OF
PETITION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

I, William T. Hangley, declare, pursuant to 28 U.S.C. § 1746:

1. I submit this declaration in support of the Faneca Objectors'¹ Petition for an Award of Attorneys' Fees and Expenses in connection with services rendered to the benefit of the settlement class in the above-captioned case. I have personal knowledge of the matters set forth in this Declaration, and if called upon, I would testify as follows:

¹ The Faneca Objectors – Alan Faneca, Roderick Cartwright, Jeff Rohrer, and Sean Considine – were previously known to this Court as the Morey Objectors. At that time, the objector group also included Sean Morey, Ben Hamilton, and Robert Royal. Those three objectors have since opted out of the settlement class.

I. FIRM BACKGROUND AND QUALIFICATIONS

2. I founded Hangley Aronchick Segal Pudlin & Schiller with several other attorneys in 1994. Hangley Aronchick is a 50-lawyer, full-service law firm with offices in Pennsylvania and New Jersey, and an international client base. We are well known for our handling of cases likely to go to trial. We have represented some of the country's largest corporations, the Commonwealth of Pennsylvania, the City of Philadelphia, major universities and healthcare complexes, and the Pennsylvania Bar Association.

3. Our firm and its lawyers have been recognized in legal listings and publications such as the *Legal Intelligencer*, *Best Lawyers in America*, *Vault.com*, *Chambers & Partners*, *U.S. News and World Report*, and *SuperLawyers*, as well as by the Philadelphia Bar Foundation. The *National Law Journal* recently named our firm to its "Midsize Hot List," and *Benchmark Litigation* named our firm as "Pennsylvania Law Firm of the Year." The legal publication *Chambers USA* has named our litigation, bankruptcy, insurance, and real estate practices as among the best in Pennsylvania. Additional information about our firm can be found at <http://www.hangleyle.com>.

4. I am a trial lawyer with fifty years of experience. I have tried First Amendment, antitrust, patent, estates, real estate, franchise, construction, employment, unfair competition, securities, civil rights, attorney malpractice, capital punishment, and general contract and business tort cases. I am a Fellow and past Third Circuit Regent of the American College of Trial Lawyers, and the publication *Benchmark Litigation* has named me one of the "Top 100" trial lawyers in the United States. A copy of my firm biography is attached as Exhibit A.

5. Working with me on this matter was Michele D. Hangley, a partner at the firm. She has been recognized as one of the "Top 250 Women in Litigation" and a "Local Litigation

Star” by *Benchmark Litigation*, as well as a top attorney in Pennsylvania by the publication *SuperLawyers*. A copy of her firm biography is attached as Exhibit B.

II. HANGLEY ARONCHICK’S EFFORTS ON BEHALF OF THE SETTLEMENT CLASS

6. On May 5, 2014, I entered my appearance on behalf of the Faneca Objectors in this matter. Dkt. 6019. Michele Hangley entered her appearance on May 19, 2014. Dkt. 6045. Thereafter, we worked closely with co-counsel, MoloLamken LLP, to develop strategy, analyze the settling parties’ submissions, and prepare the submissions of the Faneca Objectors in this Court. We participated in the preparation and filing of the Faneca Objectors’ motion to intervene and their objection and opposition to preliminary approval of the Revised Settlement. *See* Molo Decl. ¶¶ 14-15. After this Court granted preliminary approval of the Revised Settlement on July 7, 2014, we worked with MoloLamken to prepare and file the Fancea Objectors’ objection to final approval, and their supplemental brief in support of the objection. *See id.* ¶¶ 19-22, 28. We also assisted MoloLamken in their efforts to obtain discovery by helping to prepare and file the Faneca Objectors’ discovery motions. *See id.* ¶¶ 24, 31.

7. On November 4, 2014, the Court appointed Steven Molo of MoloLamken and myself as liaison counsel for the objector groups and asked us to coordinate the presentation of objections at the November 19, 2014 fairness hearing. Dkt. 6344. I worked with Mr. Molo to communicate with the various groups of represented objectors and achieve an orderly and effective presentation of issues without duplication. *See* Molo Decl. ¶ 25.

8. Hangley Aronchick worked with MoloLamken to develop strategy for the Court’s November 19, 2014 fairness hearing, and advised Mr. Molo in connection with oral argument at the fairness hearing. *See* Molo Decl. ¶ 27. I attended the November 19, 2014 hearing.

9. In addition to assisting with proceedings in this Court, Hangley Aronchick participated in the Faneca Objectors' efforts in the Third Circuit. We worked with MoloLamken to develop a strategy for the Faneca Objectors' Rule 23(f) petition seeking review of the order granting preliminary approval to the Revised Settlement and their appeal of the order granting final approval to the Final Settlement. *See* Molo Decl. ¶¶ 18, 38-40. We advised Mr. Molo in connection with oral argument in the Third Circuit on both the Rule 23(f) petition and the appeal. Michele Hangley attended the argument on the Rule 23(f) petition, and I attended the argument on the appeal.

10. Hangley Aronchick also consulted with MoloLamken on their negotiations with the NFL regarding possible enhancements to the Final Settlement.

11. On April 18, 2016, the Third Circuit affirmed this Court's order granting final approval to the Final Settlement. *See In re: Nat'l Football League Players' Concussion Injury Litig.*, 821 F.3d 410 (2016). We consulted with MoloLamken on the decision of whether to petition for Supreme Court review of the Third Circuit's ruling. *See* Molo Decl. ¶ 43.

III. HANGLEY ARONCHICK'S TOTAL FEES AND EXPENSES

12. Over the course of two-and-a-half years, Hangley Aronchick devoted a total of 281.8 hours to representing the Faneca Objectors. At the firm's current hourly billing rates, that time represents \$175,058.50 in fees. Exhibit C is a chart summarizing the total number of hours and fees that Hangley Aronchick has devoted to this litigation. The hourly rates reflected are current market rates that other clients have agreed to pay Hangley Aronchick for legal representation. Based upon my experience, these rates are consistent with those charged by law firms engaged in the type of complex, high-stakes work that our firm does. Exhibit D is a chart summarizing the total number of hours by litigation task.

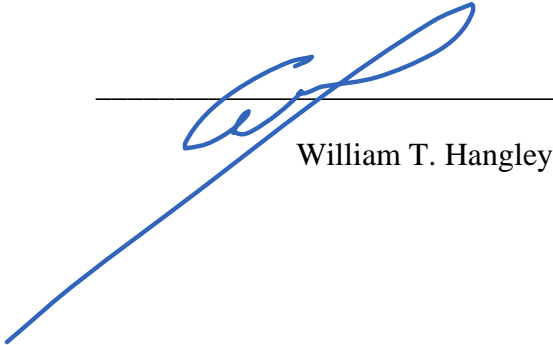
13. We also incurred \$3,829 in out-of-pocket expenses. Those costs and expenses are broken down by category in the chart attached as Exhibit E. Those costs were incurred on behalf of the class and are listed as actual costs. The expenses are reflected in Hangley Aronchick's books and records, and were prepared from receipts, check records, and other source materials. They represent an accurate recording of the expenses that Hangley Aronchick actually incurred.

14. I have reviewed the time and expenses reported by my firm in this case that are included in this declaration, and I affirm that they are true and accurate. In my experience, these fees and expenses are reasonable.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 9, 2017

In Philadelphia, Pennsylvania



William T. Hangley

Exhibit A



William T. Hangley

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square
27th Floor
Philadelphia, PA 19103-6933

E-mail: whangley@hangley.com
Phone: 215.4967001
Fax: 215.568.0300

Areas of Practice

Litigation

Education

University of Pennsylvania
Law School, Philadelphia,
Pennsylvania, 1966, LLB,
cum laude, Order of the Coif,
*University of Pennsylvania
Law Review* Comment Editor

State University of New York
College, Fredonia, New
York, 1963, BS, Music

Bar Admissions

Pennsylvania

United States Court of
Appeals Federal Circuit

United States Court of
Appeals for the Third Circuit

United States District Court
for the Eastern District of
Pennsylvania

William T. Hangley is one of America's most highly decorated trial lawyers and counselors. His practice involves representations of both plaintiffs and defendants.

He has tried (not just litigated) First Amendment, antitrust, patent, estates, real estate, franchise, construction, employment, unfair competition, securities, civil rights, attorney malpractice, capital punishment, and general contract and business tort cases.

Benchmark Litigation regularly names Bill one of the top 100 lawyers in the United States; *Best Lawyers* has named him Lawyer of the Year for "Bet the Company" litigation. *Chambers USA* has never left him off its list of "Band One" Commercial Trial Lawyers. He has several times been a top-three vote getter in the annual Pennsylvania *Super Lawyers* rankings, and was recently the on the "cover" of its annual magazine. A longtime Fellow of the American College of Trial Lawyers, he has served as the College's Regent for Pennsylvania, New Jersey, and Delaware. He recently completed a six-year tour as a member of the United States Judicial Conference Advisory Committee on Evidence Rules (by appointment of Chief Justice John Roberts), and is currently the Liaison of the ABA Section of Litigation to the Advisory Committee on Civil Rules. He has been a member and then Chair of the Pennsylvania IOLTA Board (by appointment of Pennsylvania Chief Justice Ronald Castille), and served as Chair of the Third Circuit Lawyers Advisory Committee (by appointment of Third Circuit Chief Judge Anthony Scirica). He has been Co-Chair of the ABA Section of Litigation's Federal Practice Task Force and a member of the Task Force on Discovery and Civil Justice, a joint project of the American College and the Institute for the Advancement of the American Legal System, which works to

United States District Court
for the Middle District of
Pennsylvania

address the increasing inefficiency and expense of the civil justice system and the disappearance of the civil jury trial.

United States District Court
for the District of Maryland

During the '90s, Bill presided over jury trials as a Judge Pro Tem of the Philadelphia Court of Common Pleas, helping the Court address its then-critical case backlog. He currently serves as a Special Discovery Master for district judges in two ongoing complex civil litigations.

Honors and Awards

- Beginning with its first edition, *Chambers USA: America's Leading Lawyers for Business* has named Bill as one of five or six Band One Commercial Trial Lawyers in Pennsylvania.
- He has been consistently recognized by *The Best Lawyers in America* as one of a handful of "Bet Your Company" Pennsylvania trial lawyers, and was recognized as the 2010 Philadelphia Lawyer of the Year for Bet-the-Company Litigation.
- Bill is consistently named a Local Litigation Star by *Benchmark: The Definitive Guide to America's Leading Litigation Firms and Attorneys*
- Bill has been identified every year in Pennsylvania *Super Lawyers* magazine as one of the top lawyers in Pennsylvania, and he has been ranked a Top 10 lawyer in Pennsylvania numerous times. He was the subject of the cover story in the 2012 *Super Lawyers* Magazine.
- He is also named annually in *Who's Who Legal* and the *International Who's Who of Business Lawyers*, as one of Pennsylvania's top five business trial lawyers.
- American College of Trial Lawyers, Fellow, 1987 – Present
- American Bar Foundation, Fellow
- Salzburg Seminar in American Studies, Law, University of Pennsylvania Fellow, 1970
- *University of Pennsylvania Law Review*, Comment Editor

Publications

- *Opinions Hidden, Citations Forbidden: Report And Recommendations Of the American College of Trial Lawyers On The Publication And Citation Of Nonbinding Federal Circuit Court Opinions*, 208 F.R.D. 645 (2002)
- "Teaching Through Experts: Changing the Obscure to the Obvious," *Litigation*, Spring, 2001
- "Direct and the Director: Writing, Staging and Telling The Story," *Litigation*, Fall, 1998
- "The Fourth Estate and the Second Front: Winning and Losing in the Press," *Litigation*, Spring, 1997
- "The Strike Zone, the Trial Judge and Other Moving Targets," *California Litigation* (Cal. Bar Ass'n. Section of Litigation), Spring, 1995

Exhibit B



Michele D. Hangley

Hangley Aronchick Segal Pudlin & Schiller
One Logan Square
27th Floor
Philadelphia, PA 19103-6933

E-mail: mhangley@hangley.com
Phone: 215.496.7061
Fax: 215.568.0300

Areas of Practice

Litigation

Education

University of Pennsylvania
Law School, Philadelphia,
Pennsylvania, 1998, JD,
magna cum laude
Order of the Coif

Brown University,
Providence, Rhode Island,
1988, AB

Clerkship

Honorable Phyllis A.
Kravitch, United States Court
of Appeals for the Eleventh
Circuit 1998 – 1999

Bar Admissions

Pennsylvania, 1998

New Jersey, 2000

United States Court of
Appeals for the Federal
Circuit, 2006

Michele Hangley prepares and tries commercial and legal malpractice cases in state and federal courts across the country, appearing most frequently in the U.S. District Court for the Eastern District of Pennsylvania and the Philadelphia County Court of Common Pleas.

Michele's commercial litigation practice covers a broad range of areas, including business tort and breach of contract claims and intellectual property disputes. Her clients include technology, pharmaceutical, manufacturing, and financial services companies and their principals. She also defends attorneys and law firms in legal malpractice cases arising out of complex lawsuits and transactions. Michele is a creative, but practical, litigator, who works closely with her clients to understand their goals and pursues those goals relentlessly.

Michele is frequently called upon to lecture on matters involving civil procedure and attorney ethics. She recently co-chaired a seventeen-city series of programs on the 2015 Amendments to the Federal Rules of Civil Procedure; she is a Hearing Committee Member for the Supreme Court of Pennsylvania's Disciplinary Board; and she serves on the American Bar Association Section of Litigation's Federal Practice Task Force.

Michele has been recognized as one of the country's Top 250 Women in Litigation and as a Local Litigation Star by *Benchmark: The Definitive Guide to America's Leading Litigation Firms and Attorneys*, as one of Pennsylvania's "Most Powerful and Influential Women" by the Pennsylvania Diversity Council, and as a top attorney by Pennsylvania Super Lawyers magazine. She is a 1998 *magna cum laude* graduate of the University of Pennsylvania Law School, where she was an Articles Editor of the Law Review. She received an A.B. in Political Science from Brown

United States Court of Appeals for the Third Circuit, 2005

United States District Court for the Eastern District of Pennsylvania, 1999

United States District Court for the Middle District of Pennsylvania, 2013

United States District Court District of New Jersey, 2004

University. From 1998 to 1999, Michele served as a law clerk to the Honorable Phyllis A. Kravitch of the United States Court of Appeals for the Eleventh Circuit.

Honors and Awards

- Named one of the Top 250 Women in *Litigation by Benchmark: The Definitive Guide to America's Leading Litigation Firms and Attorneys* (2014 - 2016)
- Named a Local Litigation Star by *Benchmark: The Definitive Guide to America's Leading Litigation Firms and Attorneys* (2011 - 2016)
- Named by Pennsylvania *Super Lawyers* magazine as one of the state's top attorneys (2011 - 2016) as the result of a statewide survey of lawyers
- National Diversity Council Award, "Most Powerful and Influential Women of Pennsylvania" (2015)
- Fellow of American Bar Foundation (2014 – Present)
- Academy of Advocacy at Temple University School of Law, Fellow
- *University of Pennsylvania Law Review*, Associate Editor and Articles Editor

Professional Associations and Memberships

- American Bar Association Section of Litigation
 - National Co-Chair, Federal Rules Amendments Roadshow, 2015 – Present
 - Member, Federal Practice Task Force, 2012 - Present
 - Co-Chair, Communications Committee, 2016 – Present
 - Regional Co-Chair, Judicial Intern Opportunity Program, 2011 – 2014
 - Co-Chair, Ethics and Professionalism Committee, 2008 – 2011
 - Section Liaison to ABA Task Force on Legal Process Outsourcing, 2009 – 2011
- Hearing Committee Member, Disciplinary Board of the Supreme Court of Pennsylvania, 2012 – Present
- American Bar Foundation, Fellow, 2014 – Present
- Barrister, University of Pennsylvania Law School American Inn of Court, 2012 – 2014
- Philadelphia Bar Association
- Third Circuit Bar Association
- Editorial Board, *The Legal Intelligencer*, 2003 – 2012

Publications

- "Fee Disgorgement in Attorney Breach-of-Fiduciary-Duty Cases," *The American Bar Association's Commercial & Business Litigation*, Vol. 9, No. 4, Summer 2008

Teaching/Lecturing

- Panelist, “2015 FRCP Amendments – Moving Forward,” Federation of Defense & Corporate Counsel 13th Annual Corporate Counsel Symposium, September 2016 (upcoming)
- Panelist, “Taking Rule 30(b)(6) Corporate Depositions,” American Bar Association Section of Litigation Webinar, May 2016
- Panelist, “Taking Rule 30(b)(6) Corporate Depositions: Should the 45-Year-Old Rule Be Changed?” American Bar Association Section of Litigation Section Annual Conference, April 2016
- Panelist, “Ethics and Professional Responsibility,” Pennsylvania Bar Institute’s Fourth Annual Best Practices in Pretrial Litigation in the Federal Courts, March 2016
- “The Ethics Quiz Show,” American Bar Association National Conference for the Minority Lawyer, 2009
- “When Trouble Walks In the Door: Ethical Dilemmas in Accepting an Engagement and Working Up a Case,” Annual Conference of the American Bar Association Section of Litigation, 2009
- “When Limited Liability Fails: Piercing the Corporate Veil,” Philadelphia Bar Association’s Business Litigation and Business Organizations Committees, 2007
- “Piercing the Corporate Veil,” Pennsylvania Bar Institute, 2006

Community

- Nationalities Service Center
 - First Vice Chair and Board Member, 2012 - Present
 - Chair, Development Committee, 2013 – 2015
- University of Pennsylvania Law School, Class of 1998 Class Agent, 2014 – Present
- LEADERSHIP Philadelphia, Class of 2014
- Choral Arts Society of Philadelphia, Member, 2004 – 2009

Representative Matters

- Represent a national cable and entertainment company in patent litigation involving claimed damages in the hundreds of millions of dollars.
- Secured dismissal of company founder’s breach of contract claim against specialty pharmaceutical company. *Babul v. Relmada Therapeutics, Inc.*, 2016 WL 233698 (E.D. Pa. Jan. 20, 2016).
- Successfully defended several prominent law firms and attorneys against legal malpractice suits in Pennsylvania state courts, including winning defense jury verdict in Montgomery County Court of Common Pleas after lengthy trial.
- Represented specialty pharmaceutical company in \$200+ million contract dispute with large international pharmaceutical company in Philadelphia’s Commerce Court; case ended with successful mediation and settlement.

- On behalf of newspaper and journalist defendants in libel case, defeated effort of plaintiff, a powerful Philadelphia union leader, to have U.S. District Court override state court's treatment of document from federal case file. *U.S. v. Dougherty*, 2014 WL 3676002 (E.D. Pa. June 23, 2014), *aff'd*, 627 Fed. Appx. 97 (3d Cir.), cert. denied, 130 S.Ct. 110 (2015).
- Obtained reversal of holding of the Environmental Hearing Board that municipality was not entitled to attorneys' fees under the Pennsylvania Clean Streams Law. *Chalfont-New Britain Joint Sewage Authority v. Department of Environmental Protection*, 24 A.3d 470, Pennsylvania Commonwealth Court, August 8, 2011.
- Represented owner of office building that had been condemned and demolished to make way for the expanded Pennsylvania Convention Center. After ten-day hearing before the Philadelphia Board of View, won award in the tens of millions of dollars that more than doubled the amount that the Commonwealth had offered the property owner to compensate for the condemnation.

Exhibit C

Summary of Time and Fees

	Hangley Aronchick Segal Pudlin & Schiller			
Reporting Period:	April 7, 2014 - September 2, 2016			
Timekeeper	Professional Level	Total Hours	Rate	Total Billing Amount
Hangley, William T.	PT	154.1	\$825	\$127,132.50
Hangley, Michele D.	PT	95.3	\$440	\$41,932.00
Hrouda, Robert	PR	32.4	\$185	\$5,994.00
Total:		281.8		\$175,058.50

Exhibit D

Summary of Time and Fees by Task

	Hangley Aronchick Segal Pudlin & Schiller	
Reporting Period:	April 7, 2014 - September 2, 2016	
Task Category	Total Hours	Total Billing Amount
(1) Discovery	0	\$0.00
(2) PSC Calls/Meetings	0.8	\$660.00
(3) Lead Counsel/PSC Duties	0	\$0.00
(4) Administrative	19.2	\$3,807.00
(5) MDL Status Conference	0	\$0.00
(6) Court Appearance	13	\$9,955.00
(7) Research	13.8	\$5,613.00
(8) Litigation Strategy & Analysis	99.1	\$70,427.00
(9) Pleadings/Briefs/Pre-trial Motions/Legal	61.3	\$35,726.00
(10) Experts/Consultants	0	\$0.00
(11) Settlement	2.4	\$1,980.00
(12) Appeal	72.2	\$46,890.50
(13) Miscellaneous	0	\$0.00
Total:	281.8	\$175,058.50

Exhibit E

Summary of Expenses

	Hangley Aronchick Segal Pudlin & Schiller
Reporting Period:	April 7, 2014 - September 2, 2016

Type of Expense	Total Expenses
(1) Fees	\$530.00
(2) Federal Express/Local Courier, etc.	\$658.18
(3) Postage Charges	\$0.00
(4) Fascimile Charges	\$0.00
(5) Long Distance/Conference Calls	\$0.00
(6) In-House Document Reproduction	\$1,878.00
(7) Outside Document Reproduction	\$0.00
(8) Lodging/Hotels	\$0.00
(9) Dining/Meals	\$251.36
(10) Mileage	\$0.00
(11) Air Travel	\$0.00
(12) Ground Transportation	\$56.07
(13) Legal Research/Lexis/Westlaw	\$85.90
(14) Miscellaneous (secretarial overtime)	\$369.49
Total:	\$3,829.00

Exhibit 9

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB
MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Civil Action No. 2:14-cv-00029-AB

Plaintiffs,

v.

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**DECLARATION OF LINDA S. MULLENIX IN SUPPORT OF
PETITION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

I, Linda S. Mullenix, declare, pursuant to 28 U.S.C. § 1746:

1. I submit this declaration in support of the Faneca Objectors'¹ Petition for an Award of Attorneys' Fees and Expenses in connection with services rendered to the benefit of the settlement class in the above-captioned case. I have personal knowledge of the matters set forth in this Declaration, and if called upon, I would testify as follows:

¹ The Faneca Objectors – Alan Faneca, Roderick Cartwright, Jeff Rohrer, and Sean Considine – were previously known to this Court as the Morey Objectors. At that time, the objector group also included Sean Morey, Ben Hamilton, and Robert Royal. Those three objectors have since opted out of the settlement class.

I. MY BACKGROUND AND QUALIFICATIONS

2. I have been a professor since 1974 and at the University of Texas since 1991, where I have taught classes on federal civil procedure, mass tort litigation, current issues in class action litigation, aggregate and class action litigation in a global context, state class action procedure, complex litigation, federal courts, conflicts, professional responsibility, and civil justice reform. I have also been a visiting professor at the University of Trento (Italy), Harvard Law School, the University of Michigan Law School, and Southern Methodist University Law School. I have held the Reuschlein Distinguished Visiting Chair at Villanova Law School and served as the Katherine Ryan Distinguished Professor at the Institute on World Legal Problems in Innsbruck, Austria.

3. I am the author or co-author of twenty-two books, including *Mass Tort Litigation* (3d ed. 2017); *Leading Cases in Civil Procedure* (3d ed. 2017); *Federal Courts in the Twenty-First Century* (3d ed. 2007); *State Class Action Practice and Procedure* (2000); *ALI Restatement Third, The Law Governing Lawyers* (2000); *Understanding Federal Courts* (1998; 2d ed. 2015); and *Moore's Federal Practice* (2d and 3d eds.). I have also written hundreds of articles published in *The Chicago Legal Forum*, *Cornell Law Review*, *The Georgetown Law Journal*, *Harvard Law Review*, *Michigan Law Review*, *Minnesota Law Review*, *Stanford Law Review*, *University of Pennsylvania Law Review*, *Northwestern Law Review*, *Texas Law Review*, and *Vanderbilt Law Review*, as well as numerous other journals. Courts throughout the United States have cited my articles on procedure and complex litigation.

4. I served as a Supreme Court Fellow at the Federal Judicial Center. I am an elected Life Member of the American Law Institute and the Texas Bar Foundation. I am an elected member of the American Bar Foundation and the International Association of Procedural Law. I have also served as Reporter for the ABA Task Force on Class Actions; Reporter for the

Southern District of Texas, Civil Justice Reform Act; Reporter for the National Conference of Federal-State Judicial Relationships; Advisor to the Texas Class Action Rules Subcommittee; and Advisor to the National Center for State Courts, Study on Civil Discovery.

5. My full curriculum vitae is attached as Exhibit A.

II. MY EFFORTS ON BEHALF OF THE SETTLEMENT CLASS

6. I was retained as an expert consultant by MoloLamken LLP, counsel for the Faneca Objectors, in January 2014. On May 15, 2014, I entered my appearance in this proceeding on behalf of the Faneca Objectors. Dkt. 6044. During the litigation, I worked closely with counsel for the Faneca Objectors, MoloLamken LLP, to provide expert advice on class action law. In that role, I reviewed and commented on key filings and court orders, and discussed relevant legal issues with MoloLamken. I advised MoloLamken in connection with the Faneca Objectors' motion to intervene and their objection and opposition to preliminary approval of the Revised Settlement. *See* Molo Decl. ¶¶14-15. After this Court granted preliminary approval of the Revised Settlement on July 7, 2014, I advised MoloLamken in connection with the Faneca Objectors' objection to the Revised Settlement. *See id.* ¶¶19-22.

7. I assisted MoloLamken with their preparation for the Court's November 19, 2014 fairness hearing by consulting with MoloLamken regarding the settling parties' submissions, in particular the declaration of Dr. Robert Klonoff, Class Counsel's expert on class action law.

8. I also advised MoloLamken in connection with the Faneca Objectors' efforts in the Third Circuit. I discussed with co-counsel class action law issues relevant to the Faneca Objectors' Rule 23(f) petition seeking review of this Court's order granting preliminary approval to the Revised Settlement. *See* Molo Decl. ¶18. I also consulted with MoloLamken regarding class action issues in connection with the Faneca Objectors' appeal of this Court's order granting final approval to the Final Settlement. *See id.* ¶¶38-40.

9. On April 18, 2016, the Third Circuit affirmed this Court's order granting final approval to the Final Settlement. *See In re: Nat'l Football League Players' Concussion Injury Litig.*, 821 F.3d 410 (2016). I consulted with MoloLamken regarding the decision of whether to petition for Supreme Court review of the Third Circuit's ruling. *See* Molo Decl. ¶43.

III. MY TOTAL FEES AND EXPENSES

10. Over the course of three years, I devoted a total of 71.25 hours of consulting time to the case. At my standard hourly billing rate of \$550 per hour, that time represents \$39,187.50 in fees. Exhibit B is a chart summarizing the total number of hours and fees I devoted to this litigation. The hourly rates reflected are my customary hourly rate that other clients have agreed to pay for my consulting services. To my knowledge, that rate is reasonable for expert consultants with similar qualifications and experience.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 9, 2017
In Austin, Texas

Linda S. Mullenix
Linda S. Mullenix

Exhibit A

PROFESSOR LINDA S. MULLENIX
BIOGRAPHICAL PROFILE



LINDA S. MULLENIX holds the Rita and Morris Atlas Chair in Advocacy at the University of Texas School of Law. Professor Mullenix earned M.Phil. and Ph.D. degrees in political science from Columbia University and graduated Phi Beta Kappa, magna cum laude from the City College of New York. She received her law degree from Georgetown University Law Center and practiced appellate litigation in Washington, D.C. She has been a college and law professor since 1974.

Professor Mullenix has served as a Supreme Court Fellow at the Federal Judicial Center; a scholar-in-residence at the Rockefeller Foundation Bellagio Study and Conference Center in Italy; and held the Fulbright Senior Distinguished Chair in Law, in Trento, Italy. She is an elected Life Member of the American Law Institute, and an elected Life Fellow of the Texas Bar Foundation. She also is an elected Fellow of the American Bar Foundation, as well as the International Association of Procedural Law. She served on the Board of Directors of the Austin Fulbright Alumni Association.

In January 2012, Professor Mullenix was honored as a “Pathfinder 2012” by the Travis County Women’s Law Association, which recognizes women in the community who “have used their law degrees in ways that inspire the rest of us.”

Professor Mullenix teaches federal civil procedure, mass tort litigation, and various courses relating to class action litigation. She also has taught complex litigation, federal courts, conflict of laws, professional responsibility, and civil justice reform. She has been a visiting professor at Oxford University, the University of Trento (Italy), Harvard, Michigan, and Southern Methodist law schools; held the Reuschlein Distinguished Visiting Chair (Villanova); and served as the Katherine Ryan Distinguished Professor at the Institute on World Legal Problems in Innsbruck, Austria.

Professor Mullenix is the author or co-author of twenty-two books including *MASS TORT LITIGATION* (3d ed. 2017); *LEADING CASES IN CIVIL PROCEDURE* (3d ed. 2017); *UNDERSTANDING FEDERAL COURTS* (2d ed. 2015); *CIVIL PROCEDURE BLACKLETTER SERIES* (2d ed. 2014); *FEDERAL COURTS IN THE TWENTY-FIRST CENTURY* (3d ed. 2007); *STATE CLASS ACTION PRACTICE AND PROCEDURE* (2000); *RESTATEMENT THIRD, THE LAW GOVERNING LAWYERS* (2000); and *MOORE’S FEDERAL PRACTICE*.

For more than twenty years she has been a contributor to *Preview of Supreme Court Cases* and a regular columnist for the *National Law Journal*. She served as an Associate Reporter for the *ALI Restatement of the Law Governing Lawyers*, a consultative member of the *ALI Transnational Rules of Civil Procedure* and the *ALI Complex Litigation Project*. Professor Mullenix has written dozens of articles published in *The Chicago Legal Forum*, *Cornell Law Review*, *Georgetown University Law Journal*, *Harvard Law Review*, *Michigan Law Review*, *Minnesota Law Review*, *Stanford Law Review*, *The Stanford Journal of Complex Litigation*, *University of Pennsylvania Law Review*, *Northwestern Law Review*, *Texas Law Review*, and *Vanderbilt Law Review*, as well as numerous other journals.

Professor Mullenix has served the profession in various capacities, including as Reporter for an ABA Task Force on Class Actions; Reporter for the Southern District of Texas, Civil Justice Reform Act; Reporter for the National Conference of Federal-State Judicial Relationships; Advisor, Texas Class Action Rules Subcommittee; and Advisor, National Center for State Courts, *Study on Civil Discovery*.

Professor Mullenix has been an invited participant at numerous academic conferences, including the ABA Conference on the Future of Class Action Litigation in America; the Symposium on Cutting Edge Issues in Class Action Litigation, The Legal Forum, University of Chicago; Class Action Conference, Judicial Conference Committee on Rules of Practice and Procedure; the Gulf States Class Action Symposium; the University of Pennsylvania Symposium: Mass Torts; the ABA Class Action Institute; the Mass Tort Working Group, Judicial Conference Committee on Rules of Practice and Procedure; the Special Study Conference on Federal Rules Governing Attorney Conduct, Judicial Conference Committee on Rules of Practice and Procedure; the Research Conference on Class Actions, Institute for Judicial Administration and N.Y.U.; the Conference on Civil Procedure and the Future of the Federal Rules, Southwest Legal Foundation and S.M.U. University; and the National Mass Tort Litigation Conference. She has been a repeat participant at Emory Law School's Randolph Thrower Symposium and the DePaul University College of Law Clifford Symposium. She also has served as a faculty member for the Annual Conference on Complex Litigation and Resolution of Class Action Litigation, and has delivered lectures relating to class action litigation in Austria, Brazil, Canada, Colombia, Germany, Israel, Italy, Switzerland, and the U.K.

Courts throughout the United States have cited Professor Mullenix's articles on procedure and complex litigation. She has appeared as a radio commentator on National Public Radio and been quoted in *The New York Times*, the *Wall Street Journal*, the *Los Angeles Times*, the *National Law Journal*, *CNNOpinion.com*, and the *Guardian (U.K.)*, among other media publications. Professor Mullenix has worked as counsel and as a consulting expert with plaintiffs, defendants, and objectors on numerous prominent federal and state class action cases. In addition, Professor Mullenix has worked on Canadian class actions; class litigation under the Brazilian Consumer Protection Act; and London arbitration relating to mass tort settlements. She also has been an adviser regarding proposed Swedish and Finnish class action legislation.

View my research on my SSRN page: <http://ssrn.com/author=98468>

Faculty profile website: <http://www.utexas.edu/law/faculty/lsmull52/>

PROFESSOR LINDA S. MULLENIX

<http://www.utexas.edu/law/faculty/lsmull52/>

<http://ssrn.com/author=98468>

RESIDENCE:

2305 BARTON CREEK BLVD. #2

TEXAS 78735

PHONE: (512) 263-9330

lmullenix@hotmail.com

UNIVERSITY:

727 EAST DEAN KEETON ST. AUSTIN,

AUSTIN, TEXAS 78705

PHONE: 512-232-1375

lmullenix@law.utexas.edu

UNIVERSITY OF TEXAS SCHOOL OF LAW

RITA AND MORRIS ATLAS CHAIR IN ADVOCACY (2001- PRESENT)

WARD CENTENNIAL PROFESSOR 1991–2001

COURSES: Civil Procedure; Complex Litigation; Mass Tort Litigation; Civil Justice Reform (seminar); Current Issues in Class Action Litigation (seminar); Class Action Litigation in a Global Context; (seminar); State Class Action Practice and Procedure (seminar); Aggregate Litigation in A Global Context (seminar)

COMMITTEES: Advocacy Programs; Appointments (Chair, 1992-93); Budget; Tenure; Capital Campaign Advisory Committee; Voting Procedures; International Studies; Graduate Studies; Computer Committee; Rules & Procedures; Faculty Governance

SABBATICAL AND RESEARCH APPOINTMENTS

Eugenia C. McDonald Endowed Chair of Civil Procedure (Sabbatical 2012)

W. James Kronzer Chair in Trial and Appellate Advocacy (Summer 2010)

Edward Clark Centennial Professorship in Law (Summer 2000)

F. Scott Baldwin Research Professorship in Law (Summer 1999)

Tom Sealy Centennial Research Professorship in Law (Summer 1998)

Fred & Emily Marshall Wulff Centennial Chair (Summer 1996, 1997)

Fulbright & Jaworski Research Professorship in Law (Summer 1994)

Vinson & Elkins Chair in Law (Fall 1993)

Fred & Emily Marshall Wulff Centennial Chair in Law (Summer 1992)

OXFORD UNIVERSITY – UNIVERSITY OF TEXAS EXCHANGE PROGRAM

VISITING SCHOLAR, MAY 2013

FULBRIGHT DISTINGUISHED SENIOR CHAIR IN LAW

UNIVERSITY OF TRENTO, ITALY

SPRING 2007

SCHOLAR-IN-RESIDENCE, THE ROCKEFELLER FOUNDATION BELLAGIO

STUDY AND CONFERENCE CENTER

BELLAGIO, ITALY (2002)

DISTINGUISHED VISITING PROFESSORSHIP IN ADVOCACY AND DISPUTE RESOLUTION

The Center for Advocacy and Dispute Resolution

University of Tennessee College of Law, Spring 2001

HAROLD GILL REUSCHLEIN DISTINGUISHED VISITING CHAIR

Villanova University School of Law, Spring 2000
Mass Tort Litigation

UNIVERSITY OF MICHIGAN LAW SCHOOL

Visiting Professor, Fall 1996
Mass Tort Litigation; Civil Justice Reform

HARVARD UNIVERSITY LAW SCHOOL

Visiting Professor, 1994-95
Civil Procedure; Complex Litigation; Mass Tort Litigation

SOUTHERN METHODIST UNIVERSITY SCHOOL OF LAW

Visiting Professor, Spring 1998
Mass Tort Litigation

ST. MARY'S INSTITUTE ON WORLD LEGAL PROBLEMS, INNSBRUCK, AUSTRIA

Katherine Ryan Distinguished Professor, 1997
International Litigation and Arbitration (2002)
Mass Litigation in the European Union (1996, 1997, 1999, 2009, 2011, 2012, 2016)

SUPREME COURT JUDICIAL FELLOW, Federal Judicial Center, 1989-90

CATHOLIC UNIVERSITY OF AMERICA SCHOOL OF LAW

Professor 1989-91; Associate Professor 1986-1989
Assistant Professor 1984-86; Visiting Assistant Professor 1983-84

COURSES: Civil Procedure; Complex Litigation; Federal Courts; Conflict of Laws; Trial Advocacy; Estates; Professional Responsibility

COMMITTEES: Admissions; Budget (faculty elected); Curriculum; Dean's Search Committee, 1986 (faculty elected)

TEACHING HONORS: Graduation Marshal, 1986

LOYOLA OF LOS ANGELES LAW SCHOOL

Visiting Professor, 1982-83
Clinical Professor, 1982; Instructor, 1981

COURSES: Contracts; Wills and Trusts; Community Property;
Civil Procedure Workshop; Legal Methods

PROFESSIONAL ACTIVITIES

AMERICAN BAR ASSOCIATION

Vice-Chair, Civil Procedure & Evidence Committee
Tort and Insurance Practice Section (1997-98)

Reporter, Task Force on Class Actions
Tort and Insurance Practice Section (1995-97)

Robert B. McKay Law Professor Award Committee (1997-98; 1998-99) Tort and Insurance Practice Section

Contributing Editor, *Preview of Supreme Court Cases*, Public Education Division of the American Bar Association

AMERICAN LAW INSTITUTE (elected member 1989; Life Member 2014)

Associate Reporter, RESTATEMENT OF THE LAW THIRD, THE LAW GOVERNING LAWYERS Consultative Group, COMPLEX LITIGATION PROJECT
Consultative Group, TRANSNATIONAL RULES OF CIVIL PROCEDURE

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS

Co-Reporter and Legal Advisor, Advisory Group for the United States District Court for the Southern District of Texas, Civil Justice Reform Act (1991-93)

DISTRICT OF COLUMBIA BAR

Member, Special Committee on Ethics, Continuing Legal Education, and the Model Rules of Professional Conduct (1987-89)

NATIONAL CONFERENCE ON STATE-FEDERAL JUDICIAL RELATIONSHIPS

Reporter to Hon. Chief Judge Politz, United States Court of Appeals for the Fifth Judicial Circuit (April 1992)

NATIONAL CENTER FOR STATE COURTS

Advisory Committee Member, STUDY ON STATE CIVIL DISCOVERY (1990-92)

MEMBER, INTERNATIONAL ASSOCIATION OF PROCEDURAL LAW (elected May 1997)

BOARD OF DIRECTORS, THE FULBRIGHT ALUMNI ASSOCIATION OF AUSTIN, TEXAS

COLUMNIST, THE NATIONAL LAW JOURNAL (federal practice, complex litigation, class actions)

EDITORIAL BOARD, *Journal of Legal Education* (1997-2000)

BOARD OF EDITORS, *Securities and Class Action Litigation Report (Glasser LegalWorks)*

BOARD OF ADVISERS, GREENBAG (GREENBAG ALMANAC)

ADVISORY BOARD, *BNA Class Action Reporter*

ADVISORY BOARD, *Litigation, Procedure and Dispute Resolution Abstracts*

ADVISORY BOARD, *The Review of Litigation* (UNIVERSITY OF TEXAS SCHOOL OF LAW)

CONTRIBUTING EDITOR, JOTWELL (COURTS LAW SECTION)

**INTERNATIONAL EDITORIAL BOARD, *Revista de Processo*, INSTITUTO BRASILEIRO DE DIREITO
PROCESSUAL, BRASIL**

MEMBER, SCRIBES, AMERICAN SOCIETY OF WRITERS ON LEGAL SUBJECTS

ASSOCIATION OF AMERICAN LAW SCHOOLS

Speaker, Workshop on Civil Procedure (June 2010)
Speaker, Scholarship, New Teachers' Workshop (July 1996)
Professional Development Committee (Chair, 1991-93, member 1990-1991)
Executive Committee, Conflict of Laws Section (1991-92)
Planning Committee, Workshop on Jurisprudence Throughout the Curriculum (1992)
Co-chair, Committee on Complex Litigation, Civil Procedure Section (1990-91)
Planning Committee, New Teachers Workshop (July 1990)
Group Discussion Leader, Faculty Recruitment Conference (Fall 1989, 1990)
Chair, Planning Committee, New Teachers Workshop (July 1989)
Co-chair, Committee on New Teachers, Women's Section (1989-90)
Planning Committee, Civil Procedure Conference (June 1988)
Teaching demonstration, New Teachers Workshop (July 1988)
Executive Committee, Civil Procedure Section (1987-88)

BAR AND PROFESSIONAL MEMBERSHIPS

State Bar of Texas
United States Supreme Court
United States Court of Appeals for the Fifth Judicial Circuit
United States Court of Appeals, District of Columbia United
States District Court, District of Columbia
District of Columbia Bar (inactive status)

Fellow, American Bar Foundation (elected 2011)
Fellow, Texas Bar Foundation (elected 2005)
American Law Institute (elected 1989)(life member, 2014)
American Judicature Society
American Political Science Association
American Bar Association (Litigation Section, Class Action and Derivative Litigation
Committee; Tort and Insurance Practice Section)
International Association of Procedural Law (elected July 1997)
Phi Beta Kappa (elected junior year)

WHO'S WHO

Who's Who in America, 50th – 70th eds. (1997-2015)
Who's Who In American Law, 5th-8th eds. (1987-1994)
Who's Who In American Women, 14th-25th eds. (1984-2009)
Who's Who of Emerging Leaders in America, 1st-3d eds. (1987-1990)
Who's Who in American Education, 4th-8th ed. (1993-2008)
Who's Who in the South and Southwest, 24th ed. (1994); 33rd ed. (2007)

OTHER HONORS

Pathfinder 2012, honored by the Travis County Women Lawyers Association as an attorney in the community who “has used their law degrees in ways that inspire the rest of us.”

LEGAL EDUCATION**GEORGETOWN UNIVERSITY LAW CENTER, WASHINGTON D.C.**

DEGREE: J.D., 1980
Dean's List; Law Fellow

LAW REVIEW: *The Tax Lawyer*
Associate Editor, 1979-80
Staff Member, 1978-79

CLINIC: Appellate Litigation Clinic Author,
Brief for the Respondent,
United States v. Henry, 447 U.S. 264 (1980)

GRADUATE EDUCATION**COLUMBIA UNIVERSITY, NEW YORK CITY**

DEGREES: Ph.D., Political Science, 1977
M. Phil., Political Science, 1974

HONORS: President's Fellow, Columbia University
National Defense Graduate Fellow
New York State Regents Scholar (Graduate) Danforth
Graduate Fellow, Honorable Mention
N.S.F. Graduate Fellowship, Honorable Mention

DISSERTATION: *De Facto Political Obligation: Historical and Theoretical Perspectives* (unpublished 1977)

UNDERGRADUATE EDUCATION**THE CITY COLLEGE OF NEW YORK**

DEGREE: B.A., *Magna Cum Laude*, 1971
Political Science

HONORS: Phi Beta Kappa
Dean's List; New York State Regents Scholar

PUBLICATIONS

BOOKS AND TREATISES

1. MASS TORT LITIGATION: CASES AND MATERIALS (West Academic Publishing 3d ed. 2017)(663 PGS.)
2. LEADING CASES IN CIVIL PROCEDURE (West Academic Publishing 3d ed. 2017)(984 pgs).
3. CIVIL PROCEDURE: EXAMPRO OBJECTIVE QUESTIONS AND EXPLANATIONS (West Academic Publishing 3d ed. 2016)(427 pgs).
4. UNDERSTANDING FEDERAL COURTS (LEXIS-Matthew Bender 2d ed. 2015 with Profs. Martin Redish and Georgene Vairo)(712+ pgs.)
5. CIVIL PROCEDURE (West Academic Blackletter Series 2d ed. 2014)(800+ pgs).
6. LEADING CASES IN CIVIL PROCEDURE (THOMSON WEST 2D ED. 2012)(907 PGS.)
7. LEADING CASES IN CIVIL PROCEDURE (Thomson West 2010)(891 PGS.).
8. MASS TORT LITIGATION: CASES AND MATERIALS (Thomson West 2d ed. 2008)(1440 pgs.)
 - TEACHER’S MANUAL, MASS TORT LITIGATION: CASES AND MATERIALS (Thomson West 2d ed. 2008).
 - MASS TORT LITIGATION: CASES AND MATERIALS (2010 UPDATE).
9. FEDERAL COURTS IN THE TWENTY-FIRST CENTURY: CASES AND MATERIALS (LEXIS 3d ed. 2007, with Howard K. Fink, Thomas D. Rowe, and Mark V. Tushnet).
 - TEACHER’S MANUAL, FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (LEXIS 3d ed. 2007, with Howard K. Fink, Thomas D. Rowe, and Mark V. Tushnet).
 - FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (LexisNexis), 2008 UPDATE.
 - FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (LexisNexis), 2009 UPDATE.
 - FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (LexisNexis), 2010 UPDATE.
10. CIVIL PROCEDURE: EXAMPRO-OBJECTIVE QUESTIONS AND EXPLANATIONS (2d ed. 2007 Thomson West).
11. CIVIL PROCEDURE (THOMSON WEST BLACK LETTER SERIES, 600 PGS. 2004).

12. FEDERAL COURTS IN THE TWENTY-FIRST CENTURY: CASES AND MATERIALS (LEXIS 2d ed. 2002, with Howard K. Fink, Thomas D. Rowe, and Mark V. Tushnet).
 - TEACHER’S MANUAL, FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (LEXIS 2d ed. 2002, with Howard K. Fink, Thomas D. Rowe, and Mark V. Tushnet).
 - FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (LexisNexis), 2003 UPDATE
 - FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (LexisNexis), 2004 UPDATE
 - FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (LexisNexis), 2005 UPDATE
 - FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (LexisNexis), 2006 UPDATE
13. STATE CLASS ACTION PRACTICE AND PROCEDURE (CCH 2000)(two volume treatise)(with annual updates, 2001-06).
14. RESTATEMENT OF THE LAW THIRD, THE LAW GOVERNING LAWYERS (American Law Institute 2000)(Associate Reporter).
15. UNDERSTANDING FEDERAL COURTS (LEXIS-Matthew Bender 1998)(with Profs. Martin Redish and Georgene Vairo).
16. CIVIL PROCEDURE: EXAMPRO-OBJECTIVE QUESTIONS AND EXPLANATIONS (West Group 1998).
17. MOORE'S FEDERAL PRACTICE, Vol. 17 (Lexis-Matthew Bender 3d ed. 1997), with continuous updates.
18. CIVIL PROCEDURE (Aspen Law and Business Roadmap Series 1997).
19. FEDERAL COURTS (Casenotes Legal Education Series 1997)(with Prof. Howard Fink).
20. FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (Lexis-Michie Contemporary Legal Education Series, 1996)(with Howard K. Fink, Thomas D. Rowe, and Mark V. Tushnet).
 - FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (Michie), 1997 UPDATE.
 - FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (Lexis-Michie), 1998 UPDATE.
 - TEACHER’S MANUAL, FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (Lexis-Michie Contemporary Legal Education Series, 1998)(with

Prof. Howard K. Fink, Thomas D. Rowe, and Mark V. Tushnet).

- FEDERAL COURTS IN THE 21ST CENTURY: CASES AND MATERIALS (Lexis-Michie), 1999 UPDATE.
21. MASS TORT LITIGATION: CASES AND MATERIALS (West Group 1996).
- TEACHER’S MANUAL TO ACCOMPANY MASS TORT LITIGATION: CASES AND MATERIALS (West Group 1996).
 - MASS TORT LITIGATION: CASES AND MATERIALS (West Group), 1997 UPDATE.
 - MASS TORT LITIGATION: CASES AND MATERIALS (West Group), 1998 UPDATE.
 - MASS TORT LITIGATION: CASES AND MATERIALS (West Group), 1999 UPDATE.
 - MASS TORT LITIGATION: CASES AND MATERIALS 2000 SUPPLEMENT (WEST GROUP).
22. MOORE’S FEDERAL PRACTICE, Vol. 1A, Part II (Matthew Bender 2d ed. 1991).

REPORTS AND BOOK CHAPTERS

1. *American Exceptionalism and The Theory of Convergence: Are We there Yet?*, In COMMON LAW, CIVIL LAW AND THE FUTURE OF CATEGORIES at 41 (Janet Walker and Oscar Chase eds. LexisNexis 2010)(Proceedings of the International Association of Procedural Law, Toronto Conference on “The Future of Categories”), (reprinted in 49 *The Supreme Court Review* 2d Series 41 (2010).
2. SETTLEMENTS (CHAPTER VII), in A Practitioner’s Guide to CLASS ACTIONS (Marcy Greer, ed., American Bar Association 2010).
3. *I Class Action Settlements Negli Stati Uniti* (Capitolo VII), in LA CONCILIAZIONE COLLETTIVA, Università Degli Studi di Milano, Facoltà di Giurisprudenza (2009).
4. REPORT ON COMMON LAW COUNTRIES, IN OS PROCESSES COLECTIVOS NOS PAÍSES DE CIVIL LAW E COMMON LAW, UMA ANÁLISE DE DIREITO COMPARADO (with Ada Pellegrini Grinover, Kazuo Watanabe and Linda Mullenix, Editora Revista Dos Tribunais)(Reporter, General Report for Common Law Countries)(2011).
5. *Developments in the Procedural Means for Resolution of Mass Tort Litigation in the United States*, in TERRORISM, TORT LAW AND INSURANCE: A COMPARATIVE SURVEY 204 (Bernhard A. Koch ed., 2004).
6. REPORT OF THE ABA TORT AND INSURANCE PRACTICE SECTION, TASK FORCE ON CLASS ACTIONS CONCERNING PROPOSED CHANGES TO RULE 23 OF THE FEDERAL RULES OF CIVIL PROCEDURE (1996)(Reporter).
7. REPORT AND PLAN OF THE CIVIL JUSTICE REFORM ACT ADVISORY GROUP OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS (October 1991)(Co-Reporter).

ARTICLES

PUBLISHED ARTICLES

8. *Reflections of a Recovering Aggregationist*, 15 U. Nev. L. Rev. 1455 (Winter 2015)(symposium issue).
9. *Designing a Compensatory Fund: The Search for First Principles*, 3 Stan. J. Complex Litig. 1 (2015)(symposium issue).
10. *Gaming the System: Protecting Consumers from Unconscionable Contractual Forum Selection and Arbitration Clauses*, 66 Hastings L. Rev. 719 (2015)(symposium issue).
11. *Competing Values: Preserving Litigant Autonomy in an Age of Collective Redress*, 64 DePaul L. Rev. 601 (Winter 2015)(symposium issue).
12. *Discovering Truth and the Rule of Proportionality*, I Seminario Internacional de Derecho Procesal: Dilemas Sobre La Verdad en el Proceso Judicial (2014).
13. *Personal Jurisdiction Stops Here: Cabining the Extraterritorial Reach of American Courts*, 45 U. Toledo L. Rev. 705 (2014)(symposium issue).
14. *Ending Class Actions As We Know Them: Rethinking the American Class Action*, 64 Emory L.J. 399 (2014)(the 2014 Randolph W. Thrower Symposium, American Dispute Resolution in 2020: The Death of Group Vindication of the Law?).
15. *Putting Proponents to Their Proof: Evidentiary Rules at Class Certification*, 82 G.W. U. L. Rev. 606 (2014)(symposium issue, “The Future of Class Actions”).
16. *Class Actions Shrugged: Mass Actions and the Future of Aggregate Litigation*, 32 Rev. Litig. 591 (2013)(symposium issue, “The Class Action Fairness Act of 2005: Perspectives and Predictions”).
17. *Aggregate Litigation and the Death of Democratic Dispute Resolution*, 107 Nw. U. L. Rev. 511 (2013)(symposium issue).
18. *Professor Ed Cooper: Zen Minimalist*, 46 Mich. J. of L. Ref. 661 (Winter 2013)(solicited essay in honor of Prof. Ed. Cooper, Reporter to the Advisory Committee on Civil Rules).
19. *Mass Tort Funds and the Election of Remedies: The Need for Informed Consent*, Symposium, 31 Rev. of Litig. 833 (2012)(symposium issue, “Large Scale Litigation Issues: Class Actions and Mass Tort Cases in 2012 and Beyond”).
20. *The Twenty-Fifth Anniversary of the Supreme Court’s Summary Judgment Trilogy*, 43 Loyola U. Chi. L. Rev. 651 (2012)(symposium issue).
21. *The Titanic of Worst Supreme Court Decisions: Carnival Cruise Lines v. Shute*, Symposium, The Supreme Court’s Worst Decisions, 12 U.N.L.V. L. Rev. 549 (2012).

22. *Prometheus Unbound: The BP Gulf Oil Fund as a Means for Resolving Mass Tort Claims*, 71 La. L. Rev. 819 (2011).
23. *Dubious Doctrines: The Quasi Class Action*, 80 U. Cinn. L. Rev. 389 (2011)(symposium issue, “The Principles of Aggregate Litigation: CAFA, PSLRA and Beyond”).
24. *Federal Class Actions: A Near Death Experience in a Shady Grove*, 79 G.W.U. L. Rev. 448 (2010)(in Symposium, “Aggregate Litigation: Critical Perspectives”).
25. *Dropping the Spear: The Case for Enhanced Summary Judgment Prior to Class Certification*, 43 Akron U. Law Rev. 1197 (2010)(AALS program on summary judgment January 2010).
26. *Nine Lives: The Punitive Damage Class* 58 U. Kan. L. Rev. 845 (2010)(in Symposium, “Aggregate Litigation Since *Ortiz v. Fibreboard*”).
27. *Strange Bedfellows: The Politics of Pre-emption*, 59 Case Western Reserve L. Rev. 837 (2009)(Symposium, “Access to the Courts in the Roberts Era,” January 30, 2009).
28. *I Class Action Settlements negli Stati Uniti (Class Action Settlements in the United States)*, 59 Studi Urbinati (Università degli Studi di Urbino 407 (2008)(reprinted in *La Conciliazione Collettiva* at 147 (Università Degli Studi di Milano 2009).
29. *New Trends in Standing and Res Judicata, Report for Common Law Countries*, in *Proceedings of the XIII World Congress of Procedural Law, New Trends in Procedural Law* (2007)(pp. 500-534).
30. *Baycol and Vioxx: Case Studies in Mass Tort Litigation*, in *Études et Dossiers, Working Paper Series of the Geneva Association*, International Association for the Study of Insurance Economics (2007)(paper presentation from the 2006 Annual Liability Regimes Conference)(pp. 3-1 *et seq.*).
31. *The American Class Action Fairness Bill and Forum-Shopping American-Style*, in the INTERNATIONAL ASSOCIATION FOR THE STUDY OF INSURANCE ECONOMICS: THE GENEVA PAPERS (2006)(Palgrave Macmillan Ltd).
32. *GRIDLAW: The Enduring Legacy of Phillips Petroleum Co. v. Shutts*, 74 U.M.K.C. L. Rev. 651 (2006)(symposium, “Due Process and Class Actions: The 20th Anniversary of *Phillips Petroleum v. Shutts*).
33. *The Varieties of State Rulemaking Experience and the Consequences for Substantive and Procedural Fairness*, Report of the 2005 Forum for State Appellate Court Judges, The Roscoe Pound Institute (2005).
34. *Should Mississippi Adopt a Class Action Rule? — Balancing the Equities: Ten Considerations That Mississippi Rulemakers Ought to Take Into Account in Evaluating Whether to Adopt a State Class Action Rule*, 24 Miss. C. L. Rev. 217 (2005).

35. *The Future of Tort Reform: Possible Lessons From the World Trade Center Victim Compensation Fund*, 53 Emory L. Rev. 1315 (2004)(the Randolph W. Throver Symposium on the Future of Tort Reform: Reforming the Remedy, Rebalancing the Scales, sponsored by the Emory University School of Law and the Emory Law Journal).
36. *Taking Adequacy Seriously: The Inadequate Assessment of Adequacy in Litigation and Settlement Classes*, 57 Vanderbilt L. Rev. 1687 (2004)(10th Annual Institute for Law and Economic Policy, Symposium: Protecting the Public; The Role of Private and Public Attorneys' General).
37. *Dispositive Motions After Amchem and Ortiz: The Problem of "Logically Antecedent" Inquiries*, 2004 Michigan State L. Rev. 703 (2004)(symposium on "Multi-Jurisdictional and Cross-Border Class Actions," sponsored by the Michigan State University DCL College of Law, April 16-17, 2004).
38. *Judge Jack B. Weinstein, Tort Litigation, and the Public Good*, Vol. XII (No.1) Brooklyn L. Rev. 1 (2003)(Contributor, A Roundtable Discussion to Honor One of America's Great Trail Judges on the Occasion of His 80th Birthday).
39. *Developments in the Procedural Means For Resolution of Mass Tort Litigation in the United States, 1975-2003*, 11 J. Tort and Insurance Law 204 (Springer Wien/New York 2003)(Conference on Liability for Acts of Terrorism, sponsored by the European Centre of Tort and Insurance Law).
40. *No Exit: Mandatory Class Actions in the New Millennium and the Blurring of Categorical Imperatives*, Vol. 2003 The Chicago Legal Forum 177(2003)(symposium on "Cutting Edge Issues in Class Action Litigation" sponsored by the University of Chicago Law School).
41. *The September 11th Victims' Compensation Fund: Fund Approaches to Resolving Mass Tort Litigation*, 9 Conn. Ins. L.J. 121 (2002)(symposium "September 11th Victim Compensation Fund of 2001: A Model for the Future?, Liability and Insurance After September 11th" sponsored by the University of Connecticut School of Law, Hartford, Connecticut Insurance Law Center and the Geneva Association).
42. *Some Joy in Whoville –Rule 23(f), A Good Rulemaking*, 69 U. Tenn. L. Rev. 97 (2001).
43. *Lessons From Abroad – Complexity and Convergence*, 46 Villanova L. Rev. 1 (2000)(Harold Gill Reuschlein Distinguished Visiting Chair Lecture, Villanova University School of Law).
44. *Re-Interpreting American Class Action Procedure: The United States Supreme Court Speaks*, 5 Zeitschrift Fur Zivilprozess International 337 (2000).
45. *Abandoning the Federal Class Action Ship: Is There Smoother Sailing for Class Actions in Gulf Waters*, 74 Tulane L. Rev. 1709 (2000)(symposium on class actions in the Gulf States).

46. *Back to the Futures: Privatizing Future Claimants*, 148 U. Pa. L. Rev. 1919 (2000)(Mass Torts: A Symposium, sponsored by the David Berger Program on Complex Litigation and the University of Pennsylvania Law Review in Conjunction with The Advisory Committee on Civil Rules and The Working Group on Mass Torts).
47. *Resolving Aggregate Mass Tort Litigation: The New Private Law Dispute Resolution Paradigm*, 33 Valparaiso L. Rev. 413 (1999)(Monsanto Lecture in Tort Reform).
48. *Barbecue of the Vanities*, 10 U.C.L.A. L.J. 1 (1999 – 2000).
49. *Getting to Shutts*, 46 U. Kan. L. Rev. 1 (1998)(symposium in honor of Prof. Robert Casad).
50. *Endnote: Practical Wisdom and Third-Generation Mass Tort Litigation*, 31 Loyola of Los Angeles Law Rev. 551 (1998)(symposium on mass tort litigation).
51. *The Pervasive Myth of Discovery Abuse: The Sequel*, 39 B.C.L. Rev. 683 (1998)(Advisory Committee on Civil Rules conference on discovery).
52. *The Constitutionality of the Proposed Amendment to Rule 23*, 39 Ariz. L. Rev. 615 (1997)(symposium on Rule 23: class actions at the crossroads).
53. *The Jurisprudence of Yogi Berra*, 46 Emory L.J. 697 (1997)(with thirty-eight co-authors).
54. *Class Actions, Personal Jurisdiction, and Due Process: Implications for Mass Tort Litigation*, 28 U.C. Davis L. Rev. 871 (1995) (symposium on 50th anniversary of *International Shoe Co. v. Washington*).
55. *Multiforum Federal Practice: Ethics and Erie*, 9 Geo. J. Legal Ethics 89 (1995).
56. *Judicial Power and The Rules Enabling Act*, 46 Mercer L. Rev. 733 (1995).
57. *Mass Tort Litigation and the Dilemma of Federalization*, 44 De Paul L. Rev. 755 (1995)(symposium on the federalization of state law).
58. *Jurisdiction, Justice, and Choice of Law for the Twenty-First Century*, 29 New Eng. L. Rev. 517 (1995)(conference symposium).
59. *Mass Torts as Public Interest Law: Paradigm Misplaced*, 88 Nw. U. L. Rev. 579 (1994).
60. *Adversarial Justice, Professional Responsibility, and the New Federal Discovery Rules*, 14 Rev. of Litig. 13 (1994).
61. *Discovery in Disarray: The Pervasive Myth of Pervasive Discovery Abuse and the Consequences of Unfounded Rulemaking*, 46 Stan. L. Rev. 1393 (1994)(symposium on Civil Justice Reform Act of 1990).

62. *Unfinished Symphony: The Complex Litigation Project Rests*, 54 La. L. Rev. 977 (1994).
63. *Unconstitutional Rulemaking: The Civil Justice Reform Act and Separation of Powers*, 77 Minn. L. Rev. 1283 (1993).
64. *The Counter-Reformation in Procedural Justice*, 77 Minn. L. Rev. 375 (1992).
65. *Federalizing Choice of Law in Mass Tort Litigation*, 70 Tex. L. Rev. 1623 (1992).
66. *Civil Justice Reform Comes to the Southern District of Texas: Creating and Implementing A Cost and Delay Reduction Plan Under The Civil Justice Act of 1990*, 11 Rev. of Litig. 165 (1992).
67. *Another Easy Case, Some More Bad Law: Carnival Cruise Lines and the New Contractual Personal Jurisdiction*, 27 Tex. Int'l. L.J. 323 (1992).
68. *Problems in Complex Litigation*, 10 Rev. of Litig. 213 (1991).
69. *Beyond Consolidation: Post-Aggregative Procedure in Asbestos Mass Tort Litigation*, 32 Wm. and Mary L. Rev. 475 (1991).
70. *Hope Over Experience: Mandatory Informal Discovery and The Politics of Rulemaking*, 69 N.C.L. Rev. 701 (1991).
71. *Complex Litigation Reform and Article III Jurisdiction*, 59 Fordham L. Rev. 169 (1990).
72. *God, Metaprocedure, and Metarealism at Yale*, 87 Mich. L. Rev. 1139 (1989).
73. *Suiting Up For Litigation: Focus on Pretrial Procedure*, 64 Notre Dame L. Rev. 601 (1989).
74. *The Influence of History on Procedure: Volumes of Logic, Scant Pages of History*, 50 Ohio St. L. J. 803 (1989).
75. *Another Choice of Forum, Another Choice of Law: Consensual Adjudicatory Procedure in Federal Court*, 57 Fordham L. Rev. 291 (1988).
76. *User Friendly Civil Procedure: Pragmatic Proceduralism Slouching Away From Process Theory*, 56 Fordham L. Rev. 1023 (1988).
77. *Burying (With Kindness) The Felicific Calculus of Civil Procedure*, 40 Vand. L. Rev. 541 (1987).
78. *Summary Judgment: Taming The Beast of Burdens*, 10 Am. J. of Trial Advocacy 433 (1987)(reprinted in 37 Defense Law Journal 529 (1988)).
79. *A Branch Too Far: Pruning the Abstention Doctrine*, 75 Geo. L. J. 99 (1986).

80. *Class Resolution of the Mass Tort Case: A Proposed Federal Procedure Act*, 64 Texas L. Rev. 1039 (1986).
81. *The New Federal Express: Mail Service of Process under Amended Rule 4*, 4 Rev. of Litig. 299 (1985).
82. *Creative Manipulation of Federal Jurisdiction: Is There Diversity After Death?* 70 Cornell L. Rev. 1011 (1985).
83. *The Limits of Complex Equality*, 97 Harv. L. Rev. 1801 (1984).
84. *The Valuation of an Educational Degree at Divorce*, 16 Loyola of Los Angeles L. Rev. 277 (1983).
85. *The Marriage Contract: Spouses, Lovers, and The Law*, 15 Loyola of Los Angeles L. Rev. 759 (1982).

COMMENTARY AND ANALYSIS

86. *False Narratives: Justice Scalia's Impact on Class Action Litigation*, 17 Class Action Litig. Rep. 568 (BNA) (May 27, 2016).
87. *Class Actions: A Court Divided*, 8 PREVIEW OF UNITED STATES SUPREME COURT CASES 291-296 (August 2016)(annual review of Supreme Court Cases).
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263. *Review of Abstention: The Appealability of A Refusal To Refuse Jurisdiction*, 5 Preview of United States Supreme Court Cases 135 (December 1987)(*Gulfstream Aerospace Corp. v. Mayacamas*).
264. *When Federal Courts Should Abstain: Should State Grand Juries Be Getting Any Younger?*, 2 Preview of United States Supreme Court Cases 53 (October 1987)(*Deakins v. Monaghan*).
265. *The New Untouchables: Subjecting Foreign Corporations to Federal Question Jurisdiction*, 1 Preview of United States Supreme Court Cases 18 (October 1987)(*Omni Capital International v. Wolff*).
266. *A Tull Tale of More Right Versus Less Filling: The Right to Trial by Jury in Federal Civil Penalty Cases*, 7 Preview of United States Supreme Court Cases 188 (January 1987)(*Tull v. United States*).
267. *Federal Abstention of the Fourth Kind: The Judicial Administration Exception*, 1 Preview of United States Supreme Court Cases 20 (1985)(*Lake Coal Company v. Roberts & Schaefer Company*).

LECTURES, SPEECHES & INVITED CONFERENCE PARTICIPATION

1. Speaker and panelist, Section on Litigation, Association of American Law Schools Annual Meeting 2017, San Francisco (January 6, 2017)(“MDL Problems: Policing MDL Non-Class Aggregate Settlements Through the All Writs Act”).
2. Commentator and panelist, Conference on EU Collective Redress Project, Wolfson College, Oxford University, U.K. (Dec. 12-13, 2016).
3. Endowed Lecture, the Judge Lloyd D. George Lecture on the Judicial Process, the University of Nevada Las Vegas William S. Boyd School of Law (Nov. 3, 2016)(“Empowering Judicial Oversight of MDL Non-Class Aggregate Settlements”).
4. Speaker, International Conference on the Resolution of Mass Disputes, sponsored by the University of Haifa, Israel (Nov. 26-27, 2015)(“The End of the American *Shangri-Law*: Closing the Courts to Transnational Collective Actions;” and “Mediating and Arbitrating Collective Settlements”).
5. Keynote Speaker, Class Action Symposium, 14th Annual National Consumer Law Center Conference (sponsored by the National Center for Consumer Law, Tampa, Florida, November 8-9, 2014).
6. Speaker, VII International Congress of Procedural Law (sponsored by the Universidad de Medellin, Colombia, October 17-18, 2014).

7. Speaker, Symposium, Forum Selection Clauses After *Atlantic Marine* (sponsored by the University of California, Hastings College of Law, San Francisco, September 19, 2014).
8. Speaker, Complex Litigation Symposium on the BP Gulf Oil Spill (sponsored by the Stanford Law School Journal of Complex Litigation, Stanford University Law School, Palo Alto, May 8-9, 2014).
9. Speaker, The Clifford Symposium: Judge Jack Weinstein's Impact on Civil Justice in America (sponsored by the DePaul University College of Law, April 24, 2014, Chicago Illinois).
10. Speaker, Symposium in Honor of Professor Stephen Subrin (co-sponsored by Northeastern University Law School and the University of Las Vegas, Nevada Law School, Boston, Massachusetts, April 11-12, 2014).
11. Speaker, American Bar Association Litigation Section Annual Conference, "Moldy or Not – The Impact of Comcast on the Future of Class Action Litigation, Standing, and Issues Classes (Sponsored by the ABA Litigation Section, Scottsdale, Arizona, April 9-11, 2014).
12. Speaker, Randolph W. Thrower Symposium, "American Dispute Resolution 2020: The Death of Group Vindication of the Law?," (sponsored by the Emory University School of Law, February 6, 2014, Atlanta, Georgia).
13. Faculty member, The 17th Annual American Bar Association Class Action Institute, "Standing and Class Ascertainability," (October 23-24, 2013)(Boston, Massachusetts).
14. Speaker, "Private and Government-Related Consumer Litigation," Federal Bar Association 2013 Annual Meeting and Convention (September 26-28, 2013, San Juan, Puerto Rico).
15. Invited conferee, Innovation Summit, sponsored by West Academic and Foundation Press Publishing (July 8-9, 2013, Minneapolis, Minnesota).
16. Distinguished Visiting Professor Lecture, Principles of Civil Procedure, "Aggregate Litigation and the Death of Democratic Dispute Resolution," (Oxford University U.K. May 7, 2013).
17. Colloquium presentation, American Class and Aggregate Litigation, the Oxford Centre for Socio-Legal Studies (Oxford University U.K. May 9, 2013).
18. Speaker, "Mass Tort Theory," at Symposium on Perspectives on Mass Tort Litigation, sponsored by Widener Law School Law Review (Widener Law School, Harrisburg, Pennsylvania, April 16, 2013).
19. Speaker, "The Supreme Court's Repudiation of Classwide Arbitration," at Symposium on Class Action Litigation, sponsored by the University of Michigan Journal of Law Reform (University of Michigan Law School, March 15-16, 2013).
20. Speaker, "Putting Proponents to Their Proof: Evidentiary Rules at Class Certification," at Symposium, The Future of Class Actions sponsored by the James F. Humphreys Center for Complex Litigation Public Justice, and the Committee to Support the Antitrust

Laws (George Washington University Law School, March 6-7, 2013).

21. Speaker, "Class Actions Shrugged: Mass Actions and the Future of Aggregate Litigation," AALS Section on Litigation and Section on Civil Procedure program: "The Class Action Fairness Act of 2005: Perspectives and Predictions" (New Orleans, Louisiana, January 5, 2013).
22. Speaker and Commentator, Fifth Annual Junior Faculty Federal Courts Workshop, sponsored by the Institute for the Bill of Rights, William and Mary College of Law (October 25-27, 2012).
23. Speaker, "The Political Theory of Class Actions: In Honor of Professor Martin Redish," at "Festschrift in Honor of Professor Martin Redish" (Northwestern University School of Law (Chicago, Illinois March 30, 2012).
24. Speaker, Program in Honor of Professor Edward Cooper, Reporter, Advisory Committee on Civil Rules (Meeting of the Advisory Committee on Civil Rules, Ann Arbor Michigan, March 22-23, 2012).
25. Speaker, "A Critique of Fund Approaches to Resolving Mass Tort Litigation," at Conference on Mass Torts in Federal Courts, sponsored by the Charleston School of Law (Charleston, South Carolina Feb. 23, 2012).
26. Speaker, "The BP MDL: Tort Litigation Alternatives to Fund Remediation for Mass Tort Disasters," at AALS Section on Litigation program: "Large Scale Litigation Issues: Class Actions and Mass Tort Cases in 2012 and Beyond," (Washington D.C. Jan. 6, 2012).
27. Speaker, Tarlton Talks: "A Tale of Two Funds — Comments on the World Trade Center Victims' Compensation Fund and the Gulf Coast Claims Facility," University of Texas School of Law (Nov. 9, 2011).
28. Speaker, "The Twenty-Fifth Anniversary of the Supreme Court's Summary Judgment Trilogy at Twenty-Five: Much Ado About Nothing," at Colloquium: "The 25th Anniversary of the Summary Judgment Trilogy: Reflections on Summary Judgment," Seattle University School of Law (Seattle, Washington Sept. 15-16, 2011).
29. Speaker and panelist, "Judge Jack Weinstein's Contributions to Mass Tort Litigation," program on "The Jurisprudence of Judge Jack Weinstein," sponsored by the New York City Bar Association (New York City, Sept. 13, 2011).
30. Speaker and panelist, "The Lessons of 9/11 for Mass Tort Litigation," program sponsored by the Cardozo Law School (New York City, Sept. 12, 2011).
31. Speaker, The Implications of the Supreme Court's Wal-Mart Decision for Class Action Litigation, University of Texas Supreme Court Round-Up Colloquium, September 2, 1011.
32. Speaker, Of Dubious Doctrines: The Quasi Class Action, at Symposium: "The Principles of Aggregate Litigation: CAFA, PSLRA, and Beyond," The University of Cincinnati College of Law (Cincinnati, Ohio April 1, 2011).

33. Speaker, The BP Oil Spill and the Future of Mass Tort Litigation, 58th Annual Mineral Law Institute (Louisiana State University, Baton Rouge, Louisiana, March 24, 2011).
34. Speaker, Seminar on Consumer Law, sponsored by the Centro de Estudos de Direito Economico e Social (CEDES)(São Paulo, Brazil, Nov. 17 – 18, 2010).
35. Speaker, “Big Topics, Shrinking Credits,” Workshop on Civil Procedure, Association of American Law Schools (New York City, June 12, 2010).
36. Speaker and Program Moderator, “How Much Evidence Is Enough for Class Certification?” American Bar Association, Litigation Section Mid-year Meeting (New York City, April 23, 2010).
37. Speaker, The Case For Enhanced Summary Judgment Prior to Class Certification, The Searle Center for Law and Economic Growth at Northwestern University School of Law, “Finding the Balance Between Benefit and Cost: A Public Policy Roundtable on the Federal Rules of Civil Procedure,” April 21 and 22, 2010 in Chicago).
38. Speaker, “Statutory and Contractual Limitations on Class Actions,” Complex Litigation Conference, George Washington University Law School (Washington D.C. March 12, 2009).
39. Speaker, “The Case for Summary Judgment Prior to Class Certification,” Annual Meeting of the Association of American Law Schools, Section on Litigation Program on Summary Judgment (New Orleans, Louisiana January 9, 2010).
40. Speaker, “Nine Lives: The Punitive Damage Class,” at Symposium, “Aggregate Litigation Since *Ortiz v. Fibreboard*,” sponsored by the University of Kansas Law Review (Lawrence, Kansas October 29-20, 2009).
41. Speaker, “American Exceptionalism and The Theory of Convergence: Are We There Yet?,” at the Toronto Conference on “The Future of Categories,” sponsored by the International Association of Procedural Law Toronto, Canada June 3-5, 2009).
42. Panelist, “*Hydrogen Peroxide's* Aftermath: New Restrictive Directives in Class Certification (Is It Applicable in All Class Actions?),” (Live Telephone Seminar /Live Audio Webcast sponsored by the American Law Institute/American Bar Association, Thursday, April 23, 2009).
43. Speaker, “Trends in Aggregate Litigation,” Future Litigation Risks Conference, sponsored by Altria Group, Inc. (Washington D.C. April 9-10, 2009).
44. Panelist, “Litigating and Trying Complex Civil Antitrust Class Actions, Part Four: Class Certification,” sponsored by the American Bar Association’s Section of Antitrust Law, Civil Practice and Procedure and Trial Practice Committees (via teleconference Feb. 17, 2008).
45. Speaker, “The Politics of Pre-emption,” Symposium, “Access to the Courts in the

- Roberts Era,” Case Western Reserve Law Review (Cleveland, Ohio January 30, 2009).
46. Speaker, “Class Action Settlements in the United States,” Conference on Comparative Collective or Class Action Settlements, sponsored by the Università degli Studi di Milano (Milan, Italy, September 26-27, 2008).
 47. Speaker, Supreme Court Roundup, “The Supreme Court Speaks on Punitive Damages and Federal Pre-emption of State Law Tort Claims” (commenting on *Exxon Mobil v. Baker* and *Reigel v. Medtronic* (2007-08 Term))(University of Texas Law School (September 4, 2008).
 48. Speaker, “Current Developments in Class Action Litigation and Antitrust Class Action Litigation” (in-house CLE program, Baker & McKenzie, Dallas, Texas and broadcast throughout Baker & McKenzie affiliate offices, June 2008).
 49. Speaker, “Asbestos Litigation and Theories of Justice,” Perspectives on Asbestos Litigation Symposium, sponsored by the Southwestern Law Review, Southwestern Law School (Los Angeles, California January 18, 2008).
 50. Speaker, Speaker, Litigation and Resolution of Complex Claims, “Class Action Fairness Act – An Update on CAFA” sponsored by Thomson-West Legalworks (San Francisco, California, November 1, 2007).
 51. Speaker, “New Trends in Standing and Res Judicata in Collective Suits, Report of the General Reporter,” XIII World Congress of Procedural Law (Salvador, Brazil, September 19, 2007).
 52. Speaker, “The Politics of Class Actions,” sponsored by the Section on Civil Procedure, The American Association of Law Schools (Washington D.C., January 4, 2007).
 53. Speaker, Annual Conference on Tort Liability Regimes, sponsored by Munich Re (Munich, Germany, October 25-27th, 2006).
 54. Speaker, Corporate Counsel Symposium, Federation of Defense and Corporate Counsel Annual Meeting (Chicago, September 28, 2006); “Update on CAFA Issues and Problems.”
 55. Speaker, The Class Action Fairness Act: One Year Later, sponsored by Thomson- West (New York City, June 27, 2006); speaker on “Understanding the Statute: CAFA Basics;” “Mass Actions”: Have ‘Mass Actions’ Been Subject to Removal?”.
 56. Speaker and panelist: “Looking Beyond the Pleadings in Class Certification Motions,” ABA-CLE Teleconference and Audio Webcast (June 13, 2006); speaker on *Eisen* rule and class certification hearings.
 57. Speaker and panelist, Civil Practice Litigation Techniques in Federal and State Courts, sponsored by ALI-ABA (Charleston, South Carolina, May 31-June 2, 2006); speaker on Emerging Problem Areas in Rule 23 (Class Actions and Class Action Fairness Act).
 58. Speaker, “Class Actions and Due Process, The 25th Anniversary of *Phillips Petroleum*

Company v. Shutts,” sponsored by the University of Missouri, Kansas City School of Law (Kansas City, April 7, 2006); speaker, “*GRIDLAW: The Enduring Legacy of Phillips Petroleum Co. v. Shutts*.”

59. Speaker, Litigation and Resolution of Complex Claims, “Class Action Fairness Act – One Year Later;” Arbitration Agreements and Class Actions,” sponsored by Thomson-West Legalworks (San Francisco, California, November 16-17, 2005).
60. Speaker and panelist, “Asbestos and the Future of Mass Tort Litigation,” at Symposium: Asbestos: Anatomy of a Mass Tort, sponsored by the University of Connecticut School of Law and the Insurance Law Center (Hartford, Connecticut, November 3-4, 2005).
61. Speaker, Annual Conference on Tort Liability Regimes, “The Class Action Fairness Act of 2005,” sponsored by Munich Re (Munich, Germany, October 26-28th, 2005).
62. Speaker, “The Morphing of the Mass Tort Landscape – What Factors Have Changed the Business of Mass Torts in Recent Years: The Class Action Fairness Act of 2005,” Wall Street Forum: Mass Tort Litigation (New York City, October 19, 2005).
63. Faculty Member and panelist, “The Class Action Fairness Act,” the American Bar Association 9th Annual National Institute on Class Actions (Chicago, September 23, 2005 and San Francisco, October 7, 2005).
64. Speaker, “The Class Action Fairness Act of 2005,” The Federal Bar Association of San Antonio (San Antonio, Texas, September 14, 2005).
65. Faculty Member and presenter, The Roscoe Pound Institute, “State Rulemaking: The Varieties of the Rulemaking Experience and the Consequences for Substantive and Procedural Fairness, at the 2005 Forum for State Appellate Judges, Toronto, Canada (July 22-23, 2005).
66. Speaker, “Cutting Edge Strategies in Class Action Litigation,” at Seminar: “Latest Developments In Class Action Law,” Fulbright & Jaworksi (Houston, Texas February 23, 2005; Dallas, Texas March 30, 2005; Austin, Texas March 31, 2005).
67. Speaker, “Should Mississippi Adopt a Class Action Rule? – Balancing the Equities: Ten Considerations That Mississippi Rulemakers Ought to Take Into Account in Evaluating Whether to Adopt a State Class Action Rule;” panelist, “The Merits and Demerits of Aggregating Civil Actions;” sponsored by the University of Mississippi Law School and Law Review Symposium “Love It or Leave It; An Examination of the Need for and Structure of a Class Action Rule for Mississippi” (Jackson, Mississippi, February 18, 2005).
68. Speaker, “Class Actions – A View From the Experts,” at the Advanced Consumer Litigation Conference sponsored by the Texas State Bar CLE and the National Association of Consumer Advocates (San Antonio, Texas, February 10-11, 2005).
69. Speaker, 14th Annual Litigation and Resolution of Complex Class Actions, sponsored by Glasser LegalWorks, January 27-28, 2005. Speaker on panels: “Recent Federal and

State Developments;” “Preliminary Issues Regarding Forum Selection, Jurisdiction, and Choice of Law;” “Electronic Discovery;” “Product Liability/Mass Tort Developments and Medical Monitoring Class Actions;” “Consumer Actions;” “Trial, Proof of Damages, and Punitive Damages;” and “Resolution and Settlement Strategies.”

70. Speaker, “Recent Developments in the Field of Class Actions and Mass Torts,” at the Corporate Counsel Symposium: Industries on the Defense – Defending and Managing Litigation Across the Country, Class Actions – Mass Torts, Aggregated Claims, New Threats, sponsored by the Federation of Defense & Corporate Counsel (September 9-10, 2004)(Milwaukee, Wisconsin, in conjunction with Marquette University Law School and in collaboration with the Product Liability Advisory Council).
71. Faculty Member and panelist, “Crossing the State Line: The Pursuit of State Law Claims for an Interstate Class, the American Bar Association 8th Annual National Institute on Class Actions (New York City, October 15, 2004 and New Orleans, October 29, 2004).
72. Speaker, *Bazze v. Green Tree Financial Corporation: Are Arbitration Agreements a Viable Tool Against Class Actions?*, The Class Action Litigation Summit: Preemptive Best Practices and Winning Strategies (June 24-25, 2004, Washington D.C.).
73. Speaker, “Taking Adequacy Seriously: The Inadequate Assessment of Adequacy in Litigation and Settlement Classes,” at the 10th Annual Institute for Law and Economic Policy, Symposium: Protecting the Public; The Role of Private and Public Attorneys’ General, sponsored by Vanderbilt University Law School and the Vanderbilt Law Journal (April 23-24, 2004, Miami, Florida).
74. Speaker, “Class Action Standing After *Amchem* and *Ortiz*: The Problem of ‘Logically Antecedent’ Inquiries,” at Symposium on Multi-Jurisdictional and Cross- Border Class Actions, Michigan State University DCL College of Law (April 16-17, 2004, East Lansing, Michigan).
75. Academic Invitee, Committee on the Rules of Practice and Procedure of the Judicial Conference of the United States, Conference on Electronic Discovery (February 20- 21, 2004, Fordham University School of Law, New York City).
76. Speaker, “The Future of Tort Reform: Possible Lessons From the World Trade Center Victim Compensation Fund,” at The Randolph W. Thrower Symposium on The Future of Tort Reform: Reforming the Remedy, Re-Balancing the Scales (February 19, 2004 at the Emory Law School, Atlanta, Georgia).
77. Presenter and Faculty Member, 13th Annual Litigation and Resolution of Class Action Litigation (November 19-20th, 2003, New York City; December 3-4, 2003, San Francisco; sponsored by Glasser LegalWorks. Panels on “Reforms in Class Action Procedures and Effects on Strategies;” “Preliminary Issues Regarding Forum Selection, Jurisdiction, and Choice of Law;” “Products Liability/Mass Tort Developments and Medical Monitoring Class Actions;” “Consumer Actions.”
78. Moderator and Presenter, The Future of Class Action Litigation in America (October 2-3, 2003, Boston, Massachusetts, sponsored by the American Bar Association, Tort Trial & Insurance Practice Section). Moderator of all panels for entire first day of program (six

- panels); panelist and presenter, "Recent Developments: Notice Issues, Res Judicata/Claim Preclusion Issues."
79. Speaker, "Developments in the Procedural Means For Resolution of Mass Tort Litigation in the United States, 1975-2003," (February 27-28, 2003), Conference on Liability for Acts of Terrorism, sponsored by the European Centre of Tort and Insurance Law, Munich, Germany.
 80. Panelist, "The Right to Opt-Out of Class Action Suits," Symposium, "Cutting Edge Issues in Class Action Litigation," (November 1-2, 2002), The Legal Forum, The University of Chicago Law School).
 81. Speaker, "September 11th Victim Compensation Fund of 2001: A Model for the Future?, Liability and Insurance After September 11th (March 21-22, 2002, University of Connecticut School of Law, Hartford, Connecticut Insurance Law Center and the Geneva Association).
 82. Commentator, "Perspectives on Dispute Resolution in the 21st Century" (January 25, 2002, William S. Boyd School of Law, University of Nevada).
 83. Speaker, "The Proposed Amendments to Federal Rule of Civil Procedure 23, The Class Action Rule" (January 16, 2002, The Federal Bar Association of San Antonio, Texas).
 84. Commentator, "Judge Jack B. Weinstein, Tort Litigation, and The Public Good" (November 9, 2001, Brooklyn Law School).
 85. Panelist, "Rules-Based Approaches to the Problems and Issues [relating to Proposed Amendments to Fed. R. Civ. P. 23]," Class Action Conference, sponsored by the Committee on Rules of Practice and Procedure of the Judicial Conference of the United States (October 22-23, 2001, Chicago, Illinois).
 86. Speaker, "A 'Predominância' e a 'Superioridade' Na Class Action for Damages Norte-Americana, IV Jornadas Brasileiras de Direito Processual Civil, sponsored by the Instituto Brasileiro de Direito Processual and Instituto Brasiliense de Ensino e Pesquisa (August 6-10, 2001, Fortaleza, Brazil).
 87. Speaker, "Where's There's Smoke: Will Tobacco Litigation Go Global?," Seventh Annual Clifford Symposium on Tort Law and Social Policy, DePaul University School of Law (April 5, 2001, Chicago, Illinois).
 88. Speaker, "A Good Rulemaking: Federal Rule 23(f)," Symposium on the New Federal Rules of Civil Procedure: How Will They Affect Litigation Strategy and Tactics?," The Center for Advocacy and Dispute Resolution at the University of Tennessee College of Law (March 15, 2001, Knoxville, Tennessee).
 89. Speaker, "Revising the Class Action Rule – Federal Rule of Civil Procedure 23," The University of Tennessee College of Law (March 8, 2001; faculty colloquium, March 5, 2001, Knoxville, Tennessee).

90. Invited Conferee, *Ad Hoc* Subcommittee on Attorney Conduct, January 2001 Invitational, Committee on Rules of Practice and Procedure of the Judicial Conference of the United States (January 17, 2001, Washington D.C.).
91. Speaker, "State Class Actions Roundup: Significant Developments in States with Large Numbers of Class Actions," American Bar Association, Fourth Annual National Institute on Class Actions (October 13, 2000, New York City; October 27, 2000, Chicago, Illinois)(with the Section of Litigation and the Center for Continuing Legal Education).
92. Instructor, National Institute for Legal Education (Stanford Law School, July 3-7, 2000; St. Mary's Law School, August 4-5, 2000; Nova University Law Center, Ft. Lauderdale, Florida, August 11-12, 2000).
93. Speaker, "Federal Harmonization of Civil Procedure in the United States," International Association of Procedural Law, Millennium Colloquium (Ghent, Belgium, April 23-28, 2000).
94. Lecture, "Lessons From Abroad: Complexity and Convergence," the Reuschlein Endowed Lecture, Villanova University School of law (Villanova, Pennsylvania, April 7, 2000).
95. Speaker, "The Impact of Federal Class Action Law on Class Actions Litigation in the Gulf States," American Bar Association Section of Litigation Annual Meeting, Committee on Class Actions and Derivative Litigation (Seattle, Washington, April 6, 2000).
96. Speaker, "Abandoning the Federal Class Action Ship: Is There Smoother Sailing for Class Actions in Gulf Waters: The Trickle Down Effects of Federal Class Action Jurisprudence on the Gulf States," Symposium on Class Actions in the Gulf States sponsored by the Tulane Law Review and Tulane Law School (New Orleans, Louisiana, March 31, 2000).
97. Speaker, "The Impact of Federal Class Action Law on Class Actions Litigation in the Gulf States," Faculty Colloquium, Villanova University School of Law (March 29, 2000).
98. Lecture, "Lessons from Abroad—Resolving Aggregate Litigation in a Global Context," (the Harold Gill Reuschlein Distinguished Visiting Distinguished Chair Lecture, Villanova University Law School).
99. Invited Participant, Special Study Meeting on Federal Rules Governing Attorney Conduct, Subcommittee on Federal Rules Governing Attorney Conduct (sponsored by the Judicial Conference Committee on Rules of Practice and Procedure, Washington D.C., February 4, 2000).
100. Speaker, "Civil Procedure in the 21st Century—The Future of Complex Litigation," Association of American Law Schools Section on Civil Procedure (Washington D.C. January 8, 2000).
101. Commentator, "Futures," Mass Tort: A Symposium, sponsored by the David Berger Program on Complex Litigation & the University of Pennsylvania Law Review, in

- Conjunction with The Advisory Committee on Civil Rules & The Working Group on Mass Torts (Philadelphia, Pennsylvania, November 11-12, 1999).
102. Speaker and Panelist, "Creating Opportunities Outside the Law School," Workshop for Women in Legal Education, Association of American Law Schools (Chicago, Illinois October 1-2, 1999).
 103. Speaker and Panelist, "New Developments in Class Actions;" and "Class Actions in State Courts: The New Forum," American Bar Association National Institute on Class Actions (Washington D.C. October 8, 1999).
 104. Speaker and Panelist, "Ethical Issues in Mass Tort Litigation," 23rd Annual Page Keeton Products Liability and Personal Injury Law Conference (Austin, Texas October 21, 1999).
 105. Instructor, National Institute for Legal Education (Nova University Law Center, Ft. Lauderdale, Florida, August 8-10, 1999).
 106. Speaker, "Guns, Butter, Tobacco and Beer—Government Sponsored Litigation—Are You Next?," speaking on "Class Action and Aggregate Litigation in a Global Context," Products Liability Advisory Council Meeting (San Antonio, Texas May 6, 1999).
 107. Speaker, "Hot Issues in Class Action Litigation," American Bar Association Section of Litigation Annual Meeting, Subcommittee on Class Actions and Derivative Litigation (Dallas, Texas April 16, 1999).
 108. Program Moderator, "How to Prosecute and Defend a National Class Action," American Bar Association Section of Litigation Annual Meeting (Dallas, Texas April 15, 1999).
 109. Colloquium Presentation, "Class Action and Aggregate Litigation in a Global Context," Valparaiso University School of Law (Valparaiso, Indiana March 26, 1999).
 110. Speaker, The Monsanto Lecture: "Resolving Aggregate Mass Tort Litigation: The New Private Law Dispute Resolution Paradigm" (Valparaiso University School of Law, Valparaiso, Indiana March 25, 1999).
 111. Moderator, Plaintiffs' Law Day (University of Texas School of Law, March 9, 1999).
 112. Panelist, "The Ethics of Mass Torts and Class Action Settlements," 8th Annual Advanced Civil Trial Law Conference (Houston, Texas, February 4-5, 1999).
 113. Commentator, "The Vicissitudes of the American Class Action," International Colloquium—Abuse of Procedural Rights: Comparative Standards of Procedural Fairness (sponsored by the International Association of Procedural Law, the Louisiana State Bar Association, International Law Section, and the Eason- Weinmann Center for Comparative Law at Tulane Law School, October 29, 1998).
 114. Invited Conferee, Conference on Mass Torts, Mass Tort Working Group (sponsored by the Committee on Rules of Practice and Procedure of the Judicial Conference of the United States, San Francisco, April 23-24, 1998).

115. Speaker, "Mass Torts, Class Actions, and Aggregative Procedure Through a Comparative Lens," Symposium on Products Liability: Comparative Approaches and Transnational Litigation (sponsored by the *Texas International Law Journal*, Austin, Texas February 20, 1998).
116. Moderator, "Ethical Issues in Mass Tort Litigation" (symposium sponsored by the *Review of Litigation*, Austin, Texas, February 6, 1998).
117. Speaker, "10th Trial by Masters" (sponsored by Tulane Law School, Continuing Legal Education, New Orleans, Louisiana, December 19, 1997).
118. Speaker, "Getting to *Shutts*," Symposium in Honor of Professor Robert Casad (sponsored by the University of Kansas Law School, November 14, 1997).
119. Commentator, "Class Actions: Uses and Abuses" (sponsored by the Austin Inns of Court, Austin, Texas, October 20, 1997).
120. Commentator, Conference on Civil Discovery Rules (sponsored by the Advisory Committee on Civil Procedure of the United States Judicial Conference, Boston College, September 4-5, 1997).
121. Speaker and Program Moderator, "Class Actions After *Georgine* and *Ahearn*: What Will the Future Bring?," American Bar Association Annual Meeting, Presidential Showcase Program (San Francisco, California, August 1, 1997).
122. Speaker, "Current Developments in Class Action Litigation," Travis County Bar Association Bench-Bar VII Conference (Montgomery, Texas May 16-18, 1997).
123. Speaker, "Mass Torts and Class Actions, Analysis of Trends and Upcoming Events," (CLE Program sponsored by Shook, Hardy & Bacon, Kansas City, Missouri, April 25, 1997).
124. Speaker, "Current Controversies in Class Action Litigation," Loyola of Los Angeles Law School (Los Angeles, California, April 10, 1997).
125. Panelist, "Class Actions at the Crossroads" (symposium conference sponsored by the University of Arizona College of Law, the Law College Association, and the Institute for Law & Economic Policy, December 13-14, 1996, Tucson, Arizona).
126. Panelist and Speaker, "Proposed Amendments to the Federal Class Action Rule 23," American Law Institute-American Bar Association Program, Employment Law: The Big Case (New Orleans, Louisiana, October 31, 1996).
127. Luncheon Speaker, "Mass Tort Class Actions: On the Ropes," American Conference Institute, Conference of Tobacco Litigation (New York City, October 10, 1996).
128. Speaker, "Legal Scholarship Over a Lifetime Academic Career," AALS Workshop for New Teachers (Washington D.C., July 27, 1996).

129. Panelist, "Mass Torts: The Problems and Potential Solutions," Product Liability Advisory Council Spring Conference (Orlando, Florida, April 24-26, 1996).
130. Invited participant, Special Study Conference on Federal Rules Governing Attorney Conduct (sponsored by the Judicial Conference Committee on Rules of Practice and Procedure, Los Angeles, California, January 9-10, 1996).
131. Invited participant, Institute of Judicial Administration, Research Conference on Class Actions and Related Issues in Complex Litigation, New York University School of Law (New York City, April 21-22, 1995).
132. Invited participant, Southwest Legal Foundation Conference on Civil Procedure and the Future of the Federal Rules (Southern Methodist University, Dallas, March 31, 1995).
133. Speaker, "Personal Jurisdiction and Plaintiffs' Due Process," University of Florida College of Law (Gainesville, Florida, March 22-23, 1995).
134. Speaker, "Multiforum Practice: Ethics and *Erie*," Philip A. Hart Lecture, Georgetown University Law Center, Symposium on Legal Ethics Into the Twenty-First Century (Washington D.C. March 17, 1995).
135. Panelist, "The Limits of Partisan Advocacy," ABA Products Liability Section (mid- year meeting, Tucson, Arizona, February 23-26, 1995).
136. Speaker, The 50th Anniversary of *International Shoe*: The Past and Future of Personal Jurisdiction, University of California at Davis School of Law (Davis, California February 10, 1995).
137. Speaker, "Mass Tort Litigation and the Dilemma of Federalization," Section on Federal Courts, Association of American Law Schools Annual Meeting (New Orleans, Louisiana, January 1995).
138. Invited Conferee, National Mass Tort Conference (Cincinnati, Ohio, November 10 - 13, 1994).
139. Panelist, Conference on Jurisdiction, Justice, and Choice of Law for the 21st Century, New England School of Law (Boston, Massachusetts, October 28 - 29, 1994).
140. Conferee, Judicial Conference of the Fifth Judicial Circuit (San Antonio, Texas, June 6-8, 1994).
141. Panelist, Women's Forum, Women in Legal Education, 40th Anniversary of Women Graduates, Georgetown University Law Center (Washington D.C., April 15, 1994).
142. Speaker, "Discovery in Disarray: The Pervasive Myth of Pervasive Discovery Abuse and the Consequences of Unfounded Rulemaking," Clason Lecture Series, the Western New England College of Law (Springfield, Massachusetts, February 28, 1994).
143. Speaker, "Opportunities, Responsibilities, and Roadblocks to Achieving Power: Working With the Legal Profession and the Bar," Miniworkshop on "Beyond Tokenism: Wrestling

with Power, Creative Opportunity," Co-Sponsored by the Professional Development Committee and the Section on Women in the Law, Association of American Law Schools Annual Meeting (Orlando, Florida, January 6, 1994).

144. Associate Reporter, The American Law Institute, PROCEEDINGS OF THE 70TH ANNUAL MEETING 1993 (presentation of Tentative *Draft No. 6* of the RESTATEMENT OF THE LAW GOVERNING LAWYERS, Washington D.C., May 13 -14, 1993).
145. Speaker, "*Carnival Cruise Lines* and Contractual Personal Jurisdiction," Section on Maritime Law, Association of American Law Schools Annual Meeting (San Francisco, California, January 9, 1993).
146. Speaker, "Civil Justice Reform Act of 1990 and Its Impact on Federal Practice and Procedure," State Bar of Texas Annual Meeting (Corpus Christi, Texas, June 26, 1992).
147. Associate Reporter, The American Law Institute, PROCEEDINGS OF THE 69TH ANNUAL MEETING 358 (1992)(presentation of Tentative *Draft No. 5* of the RESTATEMENT OF THE LAW GOVERNING LAWYERS, Washington D.C., May 14 - 15, 1992).
148. Reporter, National Conference on State-Federal Judicial Relationships (Orlando, Florida, April 10 -13, 1992).
149. Speaker, "Federalizing Choice of Law in Mass Tort Litigation," Section on Conflicts of Law, Association of American Law Schools Annual Meeting (San Antonio, Texas, January 4, 1992).
150. Presiding Officer, 15th Annual Page Keeton Products Liability and Personal Injury Law Conference (Austin, Texas, November 1991).
151. Speaker, The Alexander Watkins Terrell Lecture, "Hope Over Experience: Mandatory Informal Discovery and the Politics of Rulemaking," University of Texas School of Law (Austin, Texas, March 19, 1991).
152. Co-Chair, Committee on Complex Litigation, Section on Civil Procedure of the Association of American Law Schools; Speaker, "Problems in Complex Litigation" (annual meeting, January 1991).
153. Planning Committee Member, Workshop for New Law Teachers, Association of American Law Schools, small group discussion leader (Washington D.C., July 1990).
154. Chair and Planning Committee Member, Association of American Law Schools Workshop for New Law Teachers (Washington D.C., July 20-22, 1989).
155. Teaching Demonstration, "Teaching Methodologies: Problem Method," Association of American Law Schools Workshop For New Law Teachers, (Washington, D.C., July 21-23, 1988).
156. Planning Committee Member, Conference on Civil Procedure, Association of American Law Schools; Panelist, "Perspectives on Civil Procedure Scholarship: Integrating

Traditional Scholarship Into the Classroom;" Chair, "Civil Procedure and Other Disciplines and Perspectives;" Chair, "Innovation in the Classroom: Use of Supplementary Materials" (Charlottesville, Virginia, June 4-10, 1988).

157. Steering Committee member, symposium organizer, and panelist, D.C. Area Women Law Professors (1986-1991). Speaker, Symposium on Professional Development (Washington D.C., fall 1989); Symposium on Scholarship (Washington D.C., May 1986).

PREVIOUS ACADEMIC EMPLOYMENT

American University, Washington, D.C.
School of Justice, College of Public Affairs

Assistant Professor, 1978-1979

Adjunct Assistant Professor, 1997-78; 1979-80

Courses: Introduction to Problems of Justice; Justice and Morality; Introduction to Political Theory; Civil Disorder; Nature and Function of the American Legal System; Moral Issues in Criminal Justice; Police and the Political System; The Constitution and Criminal Procedure

Department of Government, College of Public Affairs

Adjunct Assistant Professor, Fall 1977

Course: Introduction to American Government

George Washington University, Washington, D.C.
College of General Studies

Associate Professorial Lecturer in Government, 1977-1980

Courses: The Legislative Process; U.S. Constitutional Law and Politics I;
U.S. Constitutional Law and Politics II

Georgetown University Law Center, Washington, D.C. Law
Fellow, 1978-1979

Course: Legal Research and Writing

Fordham University, Lincoln Center Campus New York
City, New York

Adjunct Assistant Professor, Political Science, 1977

Adjunct Instructor, Political Science, 1975-1977 (offered tenure track position)

Courses: Introduction to American Politics; Introduction to American Constitutional Law; Civil Liberties Under the Constitution; Political Action in America; Revolution and Revolutionary Change; Classical Political Thought; Modern Political Thought; International Law

The City College of New York, New York City
Department of Political Science Adjunct
Assistant Professor, 1977

Courses: International Law; Constitutional Law: The Federal System

The Cooper Union for the Advancement of Science and Art

Social Sciences Program

Assistant Professor, Spring 1977

Instructor, Fall 1976

Course: Politics and American Society

The New York Institute of Technology, New York City

Instructor of Political Science, Spring 1976 **Courses:**

American Government and Politics; Government and

Metropolitan Problems

The University of Maryland, European Division

Ramstein, Germany

Instructor of Political Science, 1974

PREVIOUS LEGAL EMPLOYMENT

Pierson, Ball & Dowd

Washington, D.C.

(since merged with Reed, Smith, Shaw & McClay)

Associate Attorney, 1980-1981

General corporate; FCC; Ethics in Government Act; wills and trusts; appellate

Van Arkel, Kaiser, Gressman, Dreisen & Rosenberg

Washington, D.C. (since merged with Bredhoff and Kaiser) Law

Clerk, 1979-1980

Union labor representation; class action against Government Printing Office

Musick, Peeler & Garrett Los

Angeles, California Summer

Associate, 1979

General corporate practice: litigation; tax; probate; labor law; health care

Environmental Protection Agency

Washington, D.C.

Summer Associate, 1978

Research and regulations under the Resource Conservation and Recovery Act

PERSONAL INFORMATION

Volunteer Guide, Wildbasin Nature Preserve (Austin, Texas)

Austin Habitat for Humanity (volunteer)

Westlake High School Band Parents (Board Member, 1999-2003; Chair, Chaperones, 2000-03; High School Representative, 1999-2000; Westlake Marching Festival annually)

Class reunion committee, 25th and 30th reunions, Georgetown Law Center

Class reunion committee, 40th reunion, CCNY

Exhibit B

Summary of Time and Fees by Task

	Linda S. Mullenix, Attorney at Law
Reporting Period:	January 1, 2014 - April 20, 2016

Task Category	Total Hours	Total Billing Amount
(1) Discovery	0.00	\$0.00
(2) PSC Calls/Meetings	0.00	\$0.00
(3) Lead Counsel/PSC Duties	0.00	\$0.00
(4) Administrative	0.00	\$0.00
(5) MDL Status Conference	0.00	\$0.00
(6) Court Appearance	0.00	\$0.00
(7) Research	5.00	\$2,750.00
(8) Litigation Strategy & Analysis	55.50	\$30,525.00
(9) Pleadings/Briefs/Pre-trial Motions/Legal	1.00	\$550.00
(10) Experts/Consultants	0.00	\$0.00
(11) Settlement	0.00	\$0.00
(12) Appeal	9.75	\$5,362.50
(13) Miscellaneous	0.00	\$0.00
Total:	71.25	\$39,187.50

Exhibit 10

Total Compensated Seasons

Years Played	Compensated Seasons	# Players	Total Compensated Seasons
0	0	2247	0
1	1	5041	5041
2	2	2719	5438
3	3	1940	5820
4	4	1564	6256
5	5	1366	6830
6	5	1232	6160
7	5	965	4825
8	5	889	4445
9	5	802	4010
10	5	679	3395
11+	5	1626	8130
	Total:	21070	60350

Source: Table 4-3, Dkt. 6167 at 18

Exhibit 11

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Abe, Nachi	3		1.5	Y
Abe, Takuro	1		0.5	Y
Abernathy, Chad	1		0.5	Y
Abiamiri, Rob	1		0.5	Y
Abron, Zack	1		0.5	Y
Acedo, Oscar	1		0.5	Y
Adams, Ben	2		1	Y
Adams, Louis	1		0.5	Y
Adams, Michael	2	3	1	N
Adams, Raymonn	1		0.5	Y
Adams, Scott	1	6	0	N
Adams, Stefon	1	6	0	N
Adams, Theo	2	2	1	N
Adamson, Rob	1		0.5	Y
Adibi, Nathaniel	1		0.5	Y
Adjei, Richard	4		2	Y
Adkisson, James	1	1	0.5	N
Agaoglu, Reyhan	3		1.5	Y
Age, Louis	2	1	1	N
Agee, Mel	1	5	0	N
Ajdir, Foad	3		1.5	Y
Akah, Emanuel	2		1	Y
Akers, Jeremy	1		0.5	Y
Akerstrom, Anders	2		1	Y
Alalampi, Sami	3		1.5	Y
Alcorn, Daron	1		0.5	Y
Alderson, Winston	1		0.5	Y
Aldridge, Kevin	1	1	0.5	N
Aldridge, Melvin	2	1	1	N
Ale, Arnold	1	2	0.5	N
Alexander, Andre	2		1	Y
Alexander, Bubba	1		0.5	Y
Alexander, Chris	1		0.5	Y
Alexander, Curtis	1		0.5	Y
Alexander, Jamaal	1		0.5	Y
Alexander, Jeff	1	2	0.5	N
Alexander, Ken	2		1	Y
Alexander, Mike	2		1	Y
Alexander, Philip	2		1	Y
Alford, Bill	2		1	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Alinen, Klaus	3		1.5	Y
Alipate, Tuineau	1	2	0.5	N
Allen, Alan	3		1.5	Y
Allen, Andre	1		0.5	Y
Allen, Bosley	2		1	Y
Allen, Clive	1		0.5	Y
Allen, Corey	1		0.5	Y
Allen, Derek	1	1	0.5	N
Allen, Jared	1		0.5	Y
Allen, Jeremy	1		0.5	Y
Allen, Jermaine	2		1	Y
Allen, Kevin	1	1	0.5	N
Allen, Marvin	3		1.5	Y
Allen, Mikki	1		0.5	Y
Allen, Reggie	1		0.5	Y
Allen, Tremayne	1	1	0.5	N
Allers, Jens	2		1	Y
Allmond, Marcell	1		0.5	Y
Almanzar, Luis	1		0.5	Y
Alsbury, Paul	1		0.5	Y
Alston, Charles	1		0.5	Y
Alston, Corey	1		0.5	Y
Alston, Jon	1		0.5	Y
Alvord, Steve	2	2	1	N
Alyson, Gareth	1		0.5	Y
Amaya, Akihito	2		1	Y
Amey, Vince	2	1	1	N
Ammons, David	1		0.5	Y
Amos, Willie	1		0.5	Y
Amundson, Allan	2		1	Y
Anderbrügge, Ingo	2		1	Y
Anderson, Adam	2		1	Y
Anderson, Bill	2		1	Y
Anderson, Bryan	1	1	0.5	N
Anderson, Dunstan	1	2	0.5	N
Anderson, Eric	1		0.5	Y
Anderson, Gerry	2		1	Y
Anderson, Jason	1		0.5	Y
Anderson, Jason	1	1	0.5	N
Anderson, Jeff	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Anderson, John	1		0.5	Y
Anderson, Kane	1		0.5	Y
Anderson, Ken	1	1	0.5	N
Anderson, Lance	1		0.5	Y
Anderson, Maurice	1		0.5	Y
Anderson, Sir Henry	1		0.5	Y
Ando, Sumitaka	2		1	Y
Andrew, Michael	1		0.5	Y
Andrew, Troy	2	1	1	N
Andrews, Kyle	1		0.5	Y
Andrews, Ricky	3	1	1.5	N
Andrus, Shane	1	2	0.5	N
Anelli, Mark	1	1	0.5	N
Anes, Curt	1		0.5	Y
Angoy, Jesús	7		3.5	Y
Ansu-Yeboah, Kevin	1		0.5	Y
Anthony, Charles	1		0.5	Y
Aoga, Neo	1		0.5	Y
Apolskis, Rick	2		1	Y
Archer, David	1	6	0	N
Archer, Phil	2		1	Y
Archer, Sam	1		0.5	Y
Arellanes, Jim	3		1.5	Y
Arey, Dennis	1		0.5	Y
Arnaud, Robert	1		0.5	Y
Arnold, Andre	2		1	Y
Arnold, Clay	1		0.5	Y
Aronson, Doug	2	1	1	N
Arth, Tom	2		1	Y
Asberry, Darrell	1		0.5	Y
Ashman, Duane	1		0.5	Y
Aska, Joe	1	3	0.5	N
Aslaksen, Nicolay	1		0.5	Y
Atkins, Corey	1	1	0.5	N
Atkinson, Brian	1		0.5	Y
Atkinson, Jason	1		0.5	Y
Atoe, Ryan	2		1	Y
Augafa, Patrick	1		0.5	Y
Augustino, Jason	1		0.5	Y
Austin, Larry	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Austin, Reggie	1	2	0.5	N
Austin, Rick	1		0.5	Y
Austin, Teryl	1		0.5	Y
Avery, Steve	1	5	0	N
Avetisyan, Avo	1		0.5	Y
Ayanbadejo, Brendon	1	10	0	N
Backes, Tom	1		0.5	Y
Bacon, Omar	1		0.5	Y
Badon, Adesola	1		0.5	Y
Bailey, Corey	1		0.5	Y
Bailey, Craig	1		0.5	Y
Bailey, David	2		1	Y
Bailey, David	1	1	0.5	N
Bailey, Kenny	1		0.5	Y
Bailey, Mario	6		3	Y
Bailey, Ronald	1		0.5	Y
Bailey, Thomas	1	1	0.5	N
Bailey, Troy	2		1	Y
Baisley, Jamie	3		1.5	Y
Baker, Jon	1	2	0.5	N
Baker, Jon	3		1.5	Y
Baker, Mike	1		0.5	Y
Baker, Robert	1	1	0.5	N
Baker, Steve	1		0.5	Y
Baker, Tony	2	3	1	N
Baldwin, Damon	4		2	Y
Baldwin, Fabian	2		1	Y
Ball, Chris	1		0.5	Y
Ball, LaVar	1		0.5	Y
Ballantyne, Jon	2		1	Y
Ballard, Clenton	1		0.5	Y
Ballard, Derrick	3		1.5	Y
Ballard, Jim	3		1.5	Y
Ballard, Karl	2		1	Y
Bandison, Romeo	1	2	0.5	N
Banes, Joey	1	1	0.5	N
Banks, Antonio	1	3	0.5	N
Banks, Chris	1	3	0.5	N
Banks, Shawn	3		1.5	Y
Barber, Chris	1	3	0.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Barber, Rudy	1		0.5	Y
Barbotti, Maurizio	1		0.5	Y
Barnard, Brooks	1	1	0.5	N
Barnard, David	1		0.5	Y
Barnes, Johnnie	1	4	0.5	N
Barnes, Leo	1		0.5	Y
Barnes, Lew	1	3	0.5	N
Barnes, Pat	1	1	0.5	N
Barnes, Rashidi	2	1	1	N
Barnett, Alonza	2		1	Y
Barnett, Oliver	1	6	0	N
Barnett, Thomas	1		0.5	Y
Barnett, Tim	1	3	0.5	N
Barr, Dave	1	1	0.5	N
Barr, Mike	3	1	1.5	N
Barr, Robert	3		1.5	Y
Bartalo, Steve	2	1	1	N
Barthelmes, Brian	1		0.5	Y
Bartlewski, Rich	1	2	0.5	N
Bary, Ousmane	1		0.5	Y
Baskin, Thomas	1		0.5	Y
Basler, Kyle	1		0.5	Y
Bass, Robert	1	1	0.5	N
Bateman, Eric	1		0.5	Y
Bates, Chad	2		1	Y
Bates, Steve	1		0.5	Y
Batiste, Michael	2	2	1	N
Batiste, Raymond	1		0.5	Y
Battle, Andrew	1		0.5	Y
Battle, Terry	1		0.5	Y
Bauer, Stephan	2		1	Y
Baughner, Danny	1		0.5	Y
Bautovich, Wes	1		0.5	Y
Bax, Carl	1	2	0.5	N
Baxley, Rob	1	1	0.5	N
Baxter, Neil	1		0.5	Y
Bayes, Andrew	2		1	Y
Bayne, Chris	1	2	0.5	N
Baynham, Grant	1		0.5	Y
Bazile, Wilky	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Beach, Sanjay	1	4	0.5	N
Beasley, Chad	1	1	0.5	N
Beauchamp, Tim	1		0.5	Y
Beavers, Aubrey	1	3	0.5	N
Beck, Tom	1		0.5	Y
Beckley, Jeff	3		1.5	Y
Behre, Ulf	1		0.5	Y
Beitia, Xavier	1		0.5	Y
Belden, Terry	1		0.5	Y
Belin, Chuck	1	3	0.5	N
Bell, Grantis	1		0.5	Y
Bell, Jim	2		1	Y
Bell, Jimmie	1		0.5	Y
Bell, Ken	1	4	0.5	N
Bell, Kerwin	2	1	1	N
Bell, Ricky	1	3	0.5	N
Bell, Trumane	1		0.5	Y
Bellamy, Mike	2	1	1	N
Belli, Barry	1		0.5	Y
Bellora, Luca	1		0.5	Y
Bender, Carey	1	1	0.5	N
Bender, Wes	1	2	0.5	N
Benetka, Daniel	6		3	Y
Benjamin, Na'il	1		0.5	Y
Bennett, Ben	1	1	0.5	N
Bennett, Stan	1		0.5	Y
Bennett, Tracy	1		0.5	Y
Bennetts, Aaron	1		0.5	Y
Benoit, Jermaine	2		1	Y
Benoit, Sarth	1		0.5	Y
Bentley, Scott	1	3	0.5	N
Berardelli, Paul	2		1	Y
Berger, Blaine	2		1	Y
Bergeron, David	1		0.5	Y
Berlin, Brock	1	2	0.5	N
Bernard, Mike	1		0.5	Y
Berry, Reggie	1		0.5	Y
Berryman, Jason	1		0.5	Y
Berti, Tony	1	3	0.5	N
Bethea, James	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Bethel, Randy	1		0.5	Y
Bethune, George	1	2	0.5	N
Beun, Daniel	1		0.5	Y
Beutler, Jeremy	1		0.5	Y
Biancamano, Francesco	2		1	Y
Biedermann, Claus	2		1	Y
Bierman, Randy	2		1	Y
Bingham, T.J.	2		1	Y
Birmingham, DeCori	1		0.5	Y
Bishop, Michael	1	1	0.5	N
Bishop, Octavious	1		0.5	Y
Björk, Carl-Johan	3		1.5	Y
Bjorkman, Stefan	1		0.5	Y
Black, Greg	1		0.5	Y
Black, Nathan	1	2	0.5	N
Blackman, Jon	1		0.5	Y
Blackwell, Kory	3	1	1.5	N
Blair, Ja'Waren	2		1	Y
Blair, Michael	1	1	0.5	N
Blake, Ricky	1	1	0.5	N
Blakley, Dwayne	1	4	0.5	N
Blanco, Theo	2		1	Y
Bland, Justin	1		0.5	Y
Bleker, Marcus	1		0.5	Y
Blenman, Rowelle	9		4.5	Y
Blick, John	1		0.5	Y
Blizzard, Bobby	2		1	Y
Bloedorn, Greg	1	2	0.5	N
Blokland, Patrick	1		0.5	Y
Blomvall, Carl-Johan	2		1	Y
Blundin, Matt	1	3	0.5	N
Bob, Adam	2	1	1	N
Bobo, Phillip	1		0.5	Y
Bogle, Phil	1	1	0.5	N
Bohlinger, Rob	1	1	0.5	N
Boles, Tony	1		0.5	Y
Bolling, Nate	1		0.5	Y
Bolton, Nathaniel	2		1	Y
Bonds, Byron	1		0.5	Y
Bongo-Wanga, Loliki	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Bonner, Cedric	2		1	Y
Bonner, Patrick	1		0.5	Y
Booker, Fred	1	1	0.5	N
Booker, Ulish	1		0.5	Y
Boone, Aaron	2		1	Y
Boone, Jesse	1		0.5	Y
Booth, John	1		0.5	Y
Borgella, Jocelyn	1	2	0.5	N
Borum, Jarvis	1	1	0.5	N
Bouknight, Jovon	1		0.5	Y
Bouman, Todd	1	10	0	N
Bouyer, Willie	2	1	1	N
Bowden, Andre	1		0.5	Y
Bowenkamp, John	1		0.5	Y
Bowers, Ryan	1		0.5	Y
Bowick, Tony	2	1	1	N
Bowman, Mike	1		0.5	Y
Boyd, LaVell	1	1	0.5	N
Boyd, Shane	1	1	0.5	N
Boyd, Tommie	1	2	0.5	N
Bozeman, Michael	1		0.5	Y
Bradford, Patrick	1		0.5	Y
Bradford, Vincent	2		1	Y
Bradley, Chuck	2	1	1	N
Bradley, Jykine	1		0.5	Y
Bradley, Mario	1		0.5	Y
Brady, Rickey	2	1	1	N
Bragg, Craig	1		0.5	Y
Bramlet, Casey	1	2	0.5	N
Bramlet, Corey	1		0.5	Y
Branch, Bruce	1	1	0.5	N
Branch, Calvin	1	5	0	N
Branch, Darrick	1		0.5	Y
Branch, Mario	1		0.5	Y
Brandom, John	1		0.5	Y
Brannon, Steve	2		1	Y
Branscomb, Kenyon	1		0.5	Y
Branscombe, Steven	1		0.5	Y
Brantley, Chris	1	2	0.5	N
Brantley, John	1	2	0.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Brantley, Kellen	1		0.5	Y
Brasher, Bob	1		0.5	Y
Bratton, Brian	1		0.5	Y
Bray, Jayson	1		0.5	Y
Bray, Trent	1		0.5	Y
Brazier, James	1		0.5	Y
Breeden, Sam	1		0.5	Y
Breedlove, Dimitrius	1		0.5	Y
Breedlove, Kevin	1	1	0.5	N
Bretz, Brad	3		1.5	Y
Brew, Dorian	1	2	0.5	N
Brewer, Ryan	1		0.5	Y
Brewster, Carlton	1		0.5	Y
Brice, Will	1	2	0.5	N
Brickus, Lelan	4		2	Y
Bridewell, Jeff	1		0.5	Y
Bridges, Corey	1		0.5	Y
Brielmaier, Ben	1		0.5	Y
Brigham, Marques	1		0.5	Y
Bright, Anthony	1	1	0.5	N
Brightful, Lamont	1	3	0.5	N
Brilliant, Pierre	1		0.5	Y
Brimmer, Jamaal	1		0.5	Y
Brinker, Chad	1		0.5	Y
Brinson, Dana	1	1	0.5	N
Bristol, Mark	1		0.5	Y
Britton, Eddie	1		0.5	Y
Broady, Timothy	2		1	Y
Brook, Mark	2		1	Y
Brooks, Ahmad	1	1	0.5	N
Brooks, Bobby	2	3	1	N
Brooks, Carlos	2	1	1	N
Brooks, Ethan	1	7	0	N
Brooks, Jamal	1	2	0.5	N
Brooks, Kevin	1		0.5	Y
Brooks, Reggie	1	4	0.5	N
Brooks, Steve	1	1	0.5	N
Brooks, Tony	1	1	0.5	N
Broomfield, Donald	1		0.5	Y
Broussard, Jamall	1	1	0.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Brown, Andre	1	2	0.5	N
Brown, Ben	2		1	Y
Brown, Chris	2		1	Y
Brown, Chris	1	1	0.5	N
Brown, Darwin	1		0.5	Y
Brown, DeAuntae	2	1	1	N
Brown, Delvin	1	1	0.5	N
Brown, DeMario	1		0.5	Y
Brown, Demetrius	1		0.5	Y
Brown, Denauld	2		1	Y
Brown, Eddie	1		0.5	Y
Brown, Ernie	1	1	0.5	N
Brown, Gary	2	3	1	N
Brown, Greg	2		1	Y
Brown, Henry	1		0.5	Y
Brown, James	2		1	Y
Brown, Jeff	2		1	Y
Brown, Jonathan	2	2	1	N
Brown, Justin	2		1	Y
Brown, Kerry	1		0.5	Y
Brown, LaWaylon	1		0.5	Y
Brown, Marlon	2		1	Y
Brown, Matt	1		0.5	Y
Brown, Michael	1	1	0.5	N
Brown, Pierre	1		0.5	Y
Brown, Ricky	1		0.5	Y
Brown, Rufus	1	1	0.5	N
Brown, Tim	1		0.5	Y
Brown, Tony	1	1	0.5	N
Brown, Wilbert	1	3	0.5	N
Brown, Will	1		0.5	Y
Browning, Alfonso	2		1	Y
Broyles, James	1	1	0.5	N
Brubaker, Mark	1		0.5	Y
Brunson, Joe	1		0.5	Y
Bryant, Beno	1	1	0.5	N
Bryant, Phil	1		0.5	Y
Bryant, Ricky	2		1	Y
Bryant, Taman	1		0.5	Y
Bryant, Vaughn	1		0.5	Y

Eligible Seasons Added by Credit for NFL Europe

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Bryant, Winfred	2		1	Y
Brymer, Chris	2		1	Y
Bubin, Sean	1		0.5	Y
Buchanan, Richard	1	2	0.5	N
Buck, Edward	1		0.5	Y
Buck, Jason	1	7	0	N
Buddenberg, John	2		1	Y
Buhl, Josh	1		0.5	Y
Burbage, Cornell	2	3	1	N
Burch, John	1		0.5	Y
Burford, Seth	1		0.5	Y
Burgsmüller, Manfred	7		3.5	Y
Burkett, Jeremy	1		0.5	Y
Burks, Diaello	2	1	1	N
Burman, Ed	1		0.5	Y
Burman, Jon	1		0.5	Y
Burnett, Bryce	2		1	Y
Burnett, Webbie	1		0.5	Y
Burns, Antoine	1		0.5	Y
Burr, Josh	1		0.5	Y
Burris, Henry	1	1	0.5	N
Burroughs, Justin	1		0.5	Y
Burse, Tony	2	1	1	N
Burton, Charles	2		1	Y
Burton, Kendrick	1	1	0.5	N
Busch, Peter	1		0.5	Y
Bush, Jovon	1		0.5	Y
Bussie, Arthur	1		0.5	Y
Butkus, Luke	2		1	Y
Butler, Darren	1		0.5	Y
Butler, Duane	1	2	0.5	N
Butler, Hillary	2	1	1	N
Butler, Jay	1		0.5	Y
Butler, Terry	1	1	0.5	N
Butler, Vince	1		0.5	Y
Butterfield, Mark	1		0.5	Y
Butts, Anthony	2		1	Y
By'Not'e, Butler	1	2	0.5	N
Byers, Mark	1		0.5	Y
Bynum, Reggie	1	1	0.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Byrd, Anthony	1		0.5	Y
Byrd, Israel	2	2	1	N
Byworth, Jason	4		2	Y
Cade, Eddie	1	1	0.5	N
Cadore, Mike	1		0.5	Y
Caesar, Ivan	1	1	0.5	N
Cain, Jeremy	1	9	0	N
Caldwell, Cecil	1		0.5	Y
Caldwell, David	1	1	0.5	N
Caldwell, Donnie	1		0.5	Y
Callens, Corey	2		1	Y
Campbell, Joseph	1	2	0.5	N
Campbell, Kofi	1		0.5	Y
Campbell, Lang	1		0.5	Y
Campion, Pete	1		0.5	Y
Campos, Alan	2	1	1	N
Canonico, Ed	1		0.5	Y
Cantelupe, Jim	2		1	Y
Cantrell, Barry	1	1	0.5	N
Cantu, Omar Erick	2		1	Y
Cantu, Rolando	1	1	0.5	N
Capes, Lewis	4		2	Y
Caravatta, Giulio	1		0.5	Y
Carberry, Kevin	1		0.5	Y
Carey, Richard	1	2	0.5	N
Carlyle, Calvin	1		0.5	Y
Carmazzi, Giovanni	1	1	0.5	N
Carollo, Joe	1		0.5	Y
Carothers, Greg	2		1	Y
Carpenter, Ron	1	5	0	N
Carr, Lydell	2	1	1	N
Carr, William	1		0.5	Y
Carroll, Herman	1	1	0.5	N
Carroll, Travis	1	2	0.5	N
Carson, Elliott	1		0.5	Y
Carter, Antwaun	1		0.5	Y
Carter, Bernard	1	1	0.5	N
Carter, Dwight	1		0.5	Y
Carter, Dyshod	1	3	0.5	N
Carter, Jeremy	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Carter, Johnny	1		0.5	Y
Carter, Jon	2	1	1	N
Carter, Kahlil	1		0.5	Y
Carter, Ontiwaun	3		1.5	Y
Carter, Simmie	1		0.5	Y
Carter, Tim	2	1	1	N
Carthen, Jason	1	2	0.5	N
Carthy, Trevor	1		0.5	Y
Cartwright, Ricardo	1		0.5	Y
Cash, Ataveus	2		1	Y
Castaneda, Eduardo	1		0.5	Y
Castro, Cayetano	1		0.5	Y
Caudill, Jeremy	2		1	Y
Cavallo, Tom	2		1	Y
Cavil, Ben	1	2	0.5	N
Cavil, Kwame	1	1	0.5	N
Cavka, Marko	2		1	Y
Cawley, Mike	1		0.5	Y
Cecere, Mike	1		0.5	Y
Cecil, Toby	1		0.5	Y
Cercone, Matt	1	2	0.5	N
Chambers, Derrick	1		0.5	Y
Chambers, Dwain	1		0.5	Y
Chamblin, Corey	1	1	0.5	N
Champagne, Alan	1		0.5	Y
Chandler, Darren	2		1	Y
Chandler, Dwayne	1		0.5	Y
Chaney, Jeff	2		1	Y
Chaney, Jermaine	2		1	Y
Chang, Timmy	1		0.5	Y
Chapman, Lindsey	1		0.5	Y
Chapman, Robert	1		0.5	Y
Chapura, Dick	1	1	0.5	N
Charles, Craig	1		0.5	Y
Charles, Earl	1		0.5	Y
Charles, Hency	2		1	Y
Charles, Terry	1		0.5	Y
Chase, Jeff	1		0.5	Y
Chatman, Jermaine	2		1	Y
Cheattom, Carlo	1		0.5	Y

Eligible Seasons Added by Credit for NFL Europe

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Cheek, Steve	1	1	0.5	N
Cherry, J'Juan	1		0.5	Y
Cherry, Marcus	1		0.5	Y
Chevrier, Randy	1	1	0.5	N
Childress, Ahmad	1		0.5	Y
Childress, O.J.	1	1	0.5	N
Childs, Henri	1		0.5	Y
Childs, Jason	1		0.5	Y
Childs, Ron	1	1	0.5	N
Christenson, Brandon	1	1	0.5	N
Christian, Kenny	1		0.5	Y
Chryst, George	1		0.5	Y
Clabo, Tyson	1	9	0	N
Clack, Darryl	1	4	0.5	N
Clare, Mike	2		1	Y
Clark, Bruce	2	8	0	N
Clark, Derrick	4	1	2	N
Clark, Howard	1		0.5	Y
Clark, Matthew	1		0.5	Y
Clark, Reggie	1	3	0.5	N
Clark, Rico	1	3	0.5	N
Clark, Sedric	3	1	1.5	N
Clarke, Tim	1		0.5	Y
Claro, Tom	2		1	Y
Clausen, Casey	1		0.5	Y
Claxton, Ben	1	3	0.5	N
Claybrooks, Felipe	1	2	0.5	N
Clayton, Carey	1	1	0.5	N
Clement, Ryan	1		0.5	Y
Clements, Chuck	1	1	0.5	N
Clements, Jimmy	1		0.5	Y
Clemons, Lloyd	1		0.5	Y
Clinkscale, Jonathan	1		0.5	Y
Clinton, Eugene	1		0.5	Y
Cloman, Scott	1		0.5	Y
Coauette, Greg	1		0.5	Y
Cobb, Glenn	2		1	Y
Cobb, Trevor	1	1	0.5	N
Cobbins, Lyron	1	1	0.5	N
Cobbs, Anthony	2		1	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Cobourne, Avon	1	1	0.5	N
Cochran, Earl	1	3	0.5	N
Cochran, Nate	1		0.5	Y
Cochrane, Chris	1		0.5	Y
Cockerham, Billy	1		0.5	Y
Cockrell, Randy	1		0.5	Y
Codrington, Nigel	1		0.5	Y
Coghill, George	3	4	1	N
Cohen, Dustin	2	2	1	N
Cohens, Willie	1		0.5	Y
Colbert, Darrell	1	2	0.5	N
Cole, Lee	2	1	1	N
Coleman, Calvin	1		0.5	Y
Coleman, Herb	1		0.5	Y
Coleman, Quincy	1		0.5	Y
Coleman, Travis	1	1	0.5	N
Coles, Karl	1		0.5	Y
Coley, Marvin	2		1	Y
Coll, Pau	3		1.5	Y
Collins, Chris	1		0.5	Y
Collins, Dan	1		0.5	Y
Collins, Fabray	1	1	0.5	N
Collins, Linzy	1		0.5	Y
Collins, McAlister	1		0.5	Y
Collins, Mike	1		0.5	Y
Collins, Ronald	2		1	Y
Collins, Roosevelt	1	1	0.5	N
Collins, Ryan	2	1	1	N
Collins, Shawn	1	5	0	N
Colquitt, Jerry	1		0.5	Y
Combs, Derek	1	2	0.5	N
Combs, Jonathan	1		0.5	Y
Conceton, Shurendy	2		1	Y
Conde, Cacho	1		0.5	Y
Conley, Bart	1		0.5	Y
Conley, Jonathanio	1		0.5	Y
Conley, Leonard	1		0.5	Y
Conley, Sean	1		0.5	Y
Connolly, Brian	1		0.5	Y
Connor, Rameel	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Connot, Scott	1	1	0.5	N
Conti, Eddie	2		1	Y
Cook, Ivan	1		0.5	Y
Cook, Kerwin	1		0.5	Y
Cook, Michael	1		0.5	Y
Cook, Mike	1		0.5	Y
Cooks, Terrence	2	1	1	N
Cooney, Anthony	2		1	Y
Cooper, Andre	1	1	0.5	N
Cooper, Deke	1	6	0	N
Cooper, Gary	1		0.5	Y
Cooper, Roger	1		0.5	Y
Copeland, Jeremaine	1		0.5	Y
Corell, Marc	1		0.5	Y
Cortez, Jose	1	6	0	N
Costa, Dave	1	1	0.5	N
Costa, Frank	2		1	Y
Costello, Brad	1	2	0.5	N
Cotar, Cedric	3		1.5	Y
Cotton, Curtis	1		0.5	Y
Cotton, Kotto	1		0.5	Y
Cottrell, Jim	1		0.5	Y
Cottrell, T.J.	2		1	Y
Couch, Robert	2		1	Y
Council, Keith	1		0.5	Y
Couper, Scott	9		4.5	Y
Courville, Vince	2	1	1	N
Cousins, Jomo	1		0.5	Y
Coutain, Kenny	1		0.5	Y
Covington, Brian	1		0.5	Y
Cowsette, Delbert	1	2	0.5	N
Cox, Jamal	1		0.5	Y
Cox, Jonathan	1		0.5	Y
Cox, Renard	2	1	1	N
Crafts, Jerry	1	5	0	N
Craig, Dameyune	1	2	0.5	N
Craig, Keith	1		0.5	Y
Craig, Paco	1	1	0.5	N
Crandell, Marcus	1		0.5	Y
Crawford, Darrell	1		0.5	Y

Eligible Seasons Added by Credit for NFL Europe

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Crawford, Derrick	1		0.5	Y
Crawford, Regis	1		0.5	Y
Crawford, Tarren	1		0.5	Y
Crawford, Tim	1	1	0.5	N
Crecion, Gabriel	1	1	0.5	N
Crespina, Keita	1		0.5	Y
Crigler, Eric	1		0.5	Y
Cristobal, Mario	2		1	Y
Criswell, Ray	2	2	1	N
Crittendon, Aaron	1		0.5	Y
Crocker, Sean	1		0.5	Y
Cromartie, Keaton	1		0.5	Y
Croom, Larry	3	1	1.5	N
Crooms, Chris	2	1	1	N
Crossman, Dan	2		1	Y
Crouch, Eric	1		0.5	Y
Crowder, Tom	1		0.5	Y
Crowell, Jeff	1		0.5	Y
Crowell, Rick	1		0.5	Y
Crum, Maurice	1		0.5	Y
Crummey, Pat	1		0.5	Y
Cullinane, Gene	1		0.5	Y
Cully, Steve	2		1	Y
Cummings, Chris	4		2	Y
Cunningham, Alonzo	1		0.5	Y
Curley, Dan	1	1	0.5	N
Curry, Clarence	1	1	0.5	N
Curry, Nate	1		0.5	Y
Curry, Scott	1	1	0.5	N
Curry, Walter	2		1	Y
Curtis, Bobby	1	1	0.5	N
Curtis, Isaac	1		0.5	Y
Curtis, Kevin	2		1	Y
Curtis, Travis	1	5	0	N
Czwalinna, Christian	1		0.5	Y
Czyzewski, Arden	1		0.5	Y
Dacus, David	1		0.5	Y
Dada, Omowale	1		0.5	Y
Daft, Kevin	2		1	Y
Dahlke, Dennis	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Dahlquist, Eric	1		0.5	Y
Dalton, Antico	1	2	0.5	N
Daniel, Darryl	1		0.5	Y
Daniels, Juan	1		0.5	Y
Daniels, LeShun	1	1	0.5	N
Dantzler, Woodrow	1	2	0.5	N
Darby, Brendan	1		0.5	Y
Darby, Chartric	1	9	0	N
Darrington, Charlie	2		1	Y
Datz, Daniel	1		0.5	Y
Dausin, Chris	2		1	Y
Davis, Adam	1		0.5	Y
Davis, Charles	1		0.5	Y
Davis, Darrell	1	2	0.5	N
Davis, Darrick	1		0.5	Y
Davis, Demetrius	4		2	Y
Davis, Dennis	1		0.5	Y
Davis, Ennis	1		0.5	Y
Davis, Jason	1		0.5	Y
Davis, Jason	1		0.5	Y
Davis, Jerome	1	3	0.5	N
Davis, Joel	1		0.5	Y
Davis, Josh	1		0.5	Y
Davis, Nick	1	2	0.5	N
Davis, Pat	1		0.5	Y
Davis, Pernell	2	1	1	N
Davis, Richard	1		0.5	Y
Davis, Robert	1		0.5	Y
Davis, Shockmain	1	1	0.5	N
Davis, Terence	2		1	Y
Davis, Thabiti	1	2	0.5	N
Davis, Wade	2		1	Y
Davis, Wayne	1	2	0.5	N
Dawkins, Ralph	4		2	Y
Dawson, Curry	1		0.5	Y
Day, Chris	1		0.5	Y
Day, Terry	1	1	0.5	N
De La Garza, Aldo	1		0.5	Y
Dean, Josh	1		0.5	Y
Dean, Kevin	1	1	0.5	N

Eligible Seasons Added by Credit for NFL Europe

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Dean, Konrad	1		0.5	Y
Dean, Terry	1		0.5	Y
Dees, Dempsey	1		0.5	Y
DeGraffenreid, Allen	2	1	1	N
DeLamielleure, Todd	1		0.5	Y
DeLaTorre, Aaron	1		0.5	Y
Delhomme, Jake	1	10	0	N
Deligianis, Harry	1		0.5	Y
DeLorenzo, Tony	1		0.5	Y
Demaree, Chris	1	1	0.5	N
Denis Sanchez, Aristides	1		0.5	Y
Denney, Chris	1		0.5	Y
Denson, Autry	1	4	0.5	N
DePaola, Dante	3		1.5	Y
DeRonde, Kevin	3		1.5	Y
DesRochers, Dave	2		1	Y
Devine, Matt	1		0.5	Y
Devoe, Todd	1	2	0.5	N
DeWitt, John	2		1	Y
Diaz-Infante, David	2	6	0	N
Dickerson, Bryan	1		0.5	Y
Dickerson, Kori	1	1	0.5	N
Dickerson, Ron	2	2	1	N
Dickson, Joel	1		0.5	Y
Dickson, Wayne	2		1	Y
Diedrick, Dahrran	1	1	0.5	N
Dieplinger, Benjamin	1		0.5	Y
Diliberto, Silvio	8		4	Y
Dillahunt, Ellis	1	1	0.5	N
Dillard, Sean	1		0.5	Y
Dilweg, Anthony	1	2	0.5	N
DiMario, Pete	1		0.5	Y
Dingle, Antonio	2	1	1	N
Dinkins, David	1		0.5	Y
Dinwiddie, Ryan	1		0.5	Y
Dittman, Seth	2		1	Y
Dittoe, Chris	2		1	Y
Dixon, Arrion	1		0.5	Y
Dixon, Daryl	1		0.5	Y
Dixon, Gerald	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Dixon, Jimmy	2		1	Y
Dixon, Johnny	4		2	Y
Dixon, Mark	1	6	0	N
Dixon, Titus	1	1	0.5	N
Doctor, Sean	1		0.5	Y
Doggette, Cecil	3		1.5	Y
Doghmi, Anthony	6		3	Y
Dolan, Chris	1		0.5	Y
Dominic, John	1		0.5	Y
Donald, Tony	2		1	Y
Donaldson, Cedric	2		1	Y
Dorsch, Travis	2	1	1	N
Doty, Jon	1		0.5	Y
Dougherty, Robert	1		0.5	Y
Douglas, Chris	1		0.5	Y
Douglas, Cody	1		0.5	Y
Douglas, Donald	2		1	Y
Douglas, Mike	1		0.5	Y
Douglas, Rome	2		1	Y
Douglass, Joe	2		1	Y
Downer, Cole	1		0.5	Y
Downey, Pat	1		0.5	Y
Downs, Chris	1		0.5	Y
Doxzon, Todd	1	1	0.5	N
Doyle, Pat	1		0.5	Y
Doyle, Philip	1		0.5	Y
Doyle, Shane	1		0.5	Y
Dozier, Joey	1		0.5	Y
Dragos, Scott	1	2	0.5	N
Drake, Charles	1		0.5	Y
Drake, Kevin	2		1	Y
Draper, Shawn	1		0.5	Y
Dreisbach, Scott	1	1	0.5	N
Drew, Randee	1		0.5	Y
Driever, Martin	4		2	Y
Dritlein, Michael	1		0.5	Y
Droege, Rob	1		0.5	Y
DuBose, Doug	1	2	0.5	N
DuBose, KeJaun	1		0.5	Y
Duckett, Forey	1	1	0.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Duff, Bill	3	1	1.5	N
Duff, Vontez	1		0.5	Y
Duke, Wesley	1	1	0.5	N
Dukes, Terrance	1		0.5	Y
Dumas, Jameel	2		1	Y
Dunbar, Karl	1	3	0.5	N
Duncan, Julian	1		0.5	Y
Duncan, Tim	1	1	0.5	N
Dunlap, London	2		1	Y
Dunn, Anthony	1	1	0.5	N
Dunn, Jon	1		0.5	Y
Dunn, K.D.	2	5	0	N
Dunn, Marc	1		0.5	Y
Durde, Aden	5		2.5	Y
Durden, John	1		0.5	Y
Durham, Robert	1		0.5	Y
Durkin, Bill	1		0.5	Y
Dutton, Ryan	1		0.5	Y
Dyer, Nashville	1		0.5	Y
Dykes, Sean	1	1	0.5	N
Dyko, Chris	1	1	0.5	N
Dyson, Brandon	1		0.5	Y
Eafon, Kelvin	1		0.5	Y
Eaglin, Greg	1		0.5	Y
Eakin, Kevin	2		1	Y
Early, Michael	2		1	Y
Eason, Curtis	1		0.5	Y
Edeen, David	2		1	Y
Edmonds, Chris	1	2	0.5	N
Edwards, Brian	1		0.5	Y
Edwards, Brock	1		0.5	Y
Edwards, Demetrius	1		0.5	Y
Edwards, Eric	1		0.5	Y
Edwards, Michael	2		1	Y
Edwards, Ronald	1		0.5	Y
Edwards, Sha-ron	1		0.5	Y
Edwards, Tyrone	1		0.5	Y
Edwards, Vernon	1	1	0.5	N
Egbuniwe, Chike	1		0.5	Y
Egerton, Tim	2		1	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Egge, Jeroen	2		1	Y
Eiland, Deandre	1		0.5	Y
Eitzmann, Chris	1	1	0.5	N
El-Masry, John	2		1	Y
Elezovic, Peter	1		0.5	Y
Elimimian, Abraham	2		1	Y
Elisara, Pita	2		1	Y
Elkins, Mike	1	1	0.5	N
Ellerbe, Dewitt	1		0.5	Y
Ellgering, Marc	1		0.5	Y
Ellington, Dante	1	1	0.5	N
Elliott, Brett	1		0.5	Y
Elliott, Jamin	1	2	0.5	N
Ellis, Jamal	1		0.5	Y
Ellis, Kwame	1	1	0.5	N
Ellis, Lavell	1		0.5	Y
Ellis, Theron	1		0.5	Y
Ellis, Todd	1		0.5	Y
Elpheage, Lynaris	1		0.5	Y
Elstrom, Todd	1		0.5	Y
Emanuel, Aaron	1		0.5	Y
Emanuel, Charles	1	1	0.5	N
Emanuel, Jim	2		1	Y
Emanuel, Kevin	1		0.5	Y
Engelbrecht, Dennis	2		1	Y
Engelhardt, Tim	1		0.5	Y
Engemann, Bret	2		1	Y
English, Keith	1	1	0.5	N
English, Otis	1		0.5	Y
Enzor, Jamar	1	1	0.5	N
Epps, Dwan	3		1.5	Y
Epstein, Hayden	1	1	0.5	N
Erhorn, Oliver	1		0.5	Y
Erickson, Mike	1		0.5	Y
Erney, Scott	2		1	Y
Ervin, Corris	2		1	Y
Eskridge, John	1		0.5	Y
Eslinger, Greg	1		0.5	Y
Espinoza, Alex	2	1	1	N
Esposito, Jasen	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Estelle, Mark	1		0.5	Y
Estes, Mike	1		0.5	Y
Estes, Steve	1		0.5	Y
Etheredge, Carlos	2	1	1	N
Etnel, Marlon	1		0.5	Y
Eugene, Bruce	1		0.5	Y
Eugene, Hiram	1	5	0	N
Evans, Brandon	1		0.5	Y
Evans, Greg	1	2	0.5	N
Evans, Jerry	1	3	0.5	N
Evans, Jerton	1		0.5	Y
Evans, Joey	1		0.5	Y
Evans, John	2		1	Y
Evans, Jonathan	1		0.5	Y
Evans, Mike	3	1	1.5	N
Evans, Stacy	1		0.5	Y
Evans, Willie	1		0.5	Y
Evwaraye, Seppo	1		0.5	Y
Fair, Carl	1	1	0.5	N
Farkas, Kevin	2		1	Y
Farley, Scott	1		0.5	Y
Farmer, Derek	1		0.5	Y
Farmer, Kirk	1		0.5	Y
Farr, Mel	1	1	0.5	N
Farrell, Todd	1		0.5	Y
Farrior, Matt	2		1	Y
Faumui, Ta'ase	1	2	0.5	N
Faunce, Troy	1		0.5	Y
Fears, Willie	1	2	0.5	N
Feexico, Sonny	2		1	Y
Feggins, Howard	2	1	1	N
Feighery, Kevin	1		0.5	Y
Fequiere, Fritz	3		1.5	Y
Ferguson, Nick	1	10	0	N
Fernandez, Albert	1		0.5	Y
Ferrara, Frank	1	3	0.5	N
Feugill, John	2		1	Y
Fiebiger, Jerod	1		0.5	Y
Fiedler, Jay	1	8	0	N
Fieldings, Anthony	2	1	1	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Fields, Jaime	1	2	0.5	N
Fields, Scott	1	2	0.5	N
Fife, Jason	1		0.5	Y
Figaro, Cedric	1	7	0	N
Fikse, Nate	1		0.5	Y
Finch, Lonnie	1		0.5	Y
Finke, Marcus	2		1	Y
Finke, Patrick	2		1	Y
Finkes, Matt	2	1	1	N
Finlen, Chris	2		1	Y
Finn, Dan	1		0.5	Y
Finn, Devon	1		0.5	Y
Finn, Mike	1		0.5	Y
Fischer, Olaf	2		1	Y
Fischer, Spence	1		0.5	Y
Fisher, Stephen	1		0.5	Y
Fitch, Zarnell	1		0.5	Y
Fitzhugh, Shannon	1		0.5	Y
Fitzpatrick, D.J.	1		0.5	Y
Fitzpatrick, Larry	1		0.5	Y
Fladger, Dawani	1		0.5	Y
Flannigan, J.J.	1		0.5	Y
Fleetwood, Marquel	1		0.5	Y
Fleming, Antonio	1		0.5	Y
Fleming, Terry	1		0.5	Y
Flemming, Oliver	3		1.5	Y
Flenoid, Bob	1		0.5	Y
Fletcher, Bryan	2	3	1	N
Fletcher, Cecil	2		1	Y
Fletcher, John	1	1	0.5	N
Flickinger, Robert	8		4	Y
Florine, Ron	2		1	Y
Flowers, Jason	1		0.5	Y
Flowers, Little John	2		1	Y
Flowers, Richmond	1		0.5	Y
Floyd, Anthony	1	2	0.5	N
Floyd, Marcus	2	1	1	N
Floyd, Todd	2		1	Y
Floyd, Victor	2	1	1	N
Flugence, Lawrence	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Flynn, Chris	2		1	Y
Fobbs, Jamaal	1		0.5	Y
Foggie, Fred	1	2	0.5	N
Fogle, Anthony	1		0.5	Y
Foley, Mike	1		0.5	Y
Fontana, Stevan	2		1	Y
Footte, Montee	1		0.5	Y
Ford, Bernard	1	2	0.5	N
Ford, Chris	1	1	0.5	N
Ford, Fredric	2		1	Y
Ford, Willie	2		1	Y
Forde, Andre	1		0.5	Y
Forde, Brian	1	4	0.5	N
Foreman, Tyree	1		0.5	Y
Forsythe, Byron	2		1	Y
Fortay, Bryan	1		0.5	Y
Fortune, Chad	2		1	Y
Fortune, Elliott	1	1	0.5	N
Foster, Russel	1		0.5	Y
Foster, Sean	2		1	Y
Foust, Mike	1		0.5	Y
Fowler, Carlos	1		0.5	Y
Frager, Tim	1		0.5	Y
France, Todd	1	1	0.5	N
Francis, Asa	1		0.5	Y
Frank, Donald	1	6	0	N
Frank, Garry	2		1	Y
Franklin, Brad	1	1	0.5	N
Franklin, Gabe	1		0.5	Y
Franklin, Harvey	2		1	Y
Franklin, Julius	1		0.5	Y
Franklin, Keith	1	1	0.5	N
Franklin, Michael	1		0.5	Y
Franklin, Steve	1		0.5	Y
Frazier, Lance	1	1	0.5	N
Frazier, Paul	1	1	0.5	N
Freeman, Brad	1		0.5	Y
Freeman, Corian	1		0.5	Y
Freeman, Eddie	2	2	1	N
Freeman, Jason	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Freeman, Rober'	1		0.5	Y
Freese, Jerry	1		0.5	Y
Frey, Greg	1		0.5	Y
Frier, T.J.	1		0.5	Y
Frieser, John	1		0.5	Y
Fritz, Luke	1		0.5	Y
Fruhorgen, John	1		0.5	Y
Fryar, Charles	2		1	Y
Fuller, Andy	1		0.5	Y
Fulton, Skyler	2		1	Y
Fumi, Steve	1		0.5	Y
Furrer, Will	1	2	0.5	N
Gachelin, Louis	1		0.5	Y
Gadson, Ezekial	1		0.5	Y
Gage, Steve	1	2	0.5	N
Gaines, Cory	1		0.5	Y
Gaines, Kevin	2		1	Y
Gaines, Teddy	1		0.5	Y
Gaines, Wendall	1	1	0.5	N
Gaiter, Tony	1	2	0.5	N
Gaiters, Chris	1		0.5	Y
Gales, Kenny	1		0.5	Y
Galesloot, Arnold	1		0.5	Y
Gallery, Jim	2	3	1	N
Gallery, Nick	1	1	0.5	N
Galloway, Ahmaad	2		1	Y
Galloway, Mitchell	1	1	0.5	N
Gamble, Jason	1		0.5	Y
Gamlin, Stefan	3		1.5	Y
Garau, Pedro	2		1	Y
Garcia, Dani	2		1	Y
Garcia, Juan	1		0.5	Y
Garcia, Rafael	2		1	Y
Garcia, Teddy	2	3	1	N
Gardent, Philippe	5		2.5	Y
Gardner, Derrick	2	1	1	N
Garner, Randy	1		0.5	Y
Garnett, Winfield	1	1	0.5	N
Garrett, Grant	1		0.5	Y
Garrett, Jason	1	10	0	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Garrett, John	1	1	0.5	N
Garrett, John	1		0.5	Y
Garrett, Judd	2		1	Y
Garrett, Kevin	1	3	0.5	N
Garten, Joe	2		1	Y
Gary, Willie	1	1	0.5	N
Gasperson, Michael	1	1	0.5	N
Gasser, Howard	1		0.5	Y
Gatlin, Todd	1		0.5	Y
Gatrell, Rob	2		1	Y
Gause, George	1		0.5	Y
Gay, Matt	3	1	1.5	N
Gámez, Alejandro	5		2.5	Y
Geason, Cory	1	3	0.5	N
Gehloff, Sascha	2		1	Y
Gelzheiser, Brian	1		0.5	Y
Genord, Scott	2		1	Y
George, Spencer	1	3	0.5	N
George, Tony	1	2	0.5	N
Georgiev, Vladimir	1		0.5	Y
Gerhart, Tom	1	1	0.5	N
Gerigk, Patrick	1		0.5	Y
Germaine, Joe	1	2	0.5	N
Gessner, Chas	1	1	0.5	N
Getherall, Joey	1		0.5	Y
Gholston, Kendrick	1		0.5	Y
Gianacacos, Nick	1		0.5	Y
Gibbons, Ryan	1		0.5	Y
Gibbs, Stan	1		0.5	Y
Gibson, Damon	1	4	0.5	N
Gieselman, John	1		0.5	Y
Gilbert, Greg	2		1	Y
Gilbert, O'Neill	1		0.5	Y
Gilbreath, Monty	2		1	Y
Gillespie, Robert	1		0.5	Y
Gilliard, Cory	1		0.5	Y
Gilmore, John	1		0.5	Y
Gilmore, Zain	1		0.5	Y
Giroud, Thibault	1		0.5	Y
Gissendaner, Lee	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Givan, Brenden	1		0.5	Y
Glass, John	1		0.5	Y
Glass, Myron	2		1	Y
Glasson, Steve	1		0.5	Y
Glenn, O'Neil	1		0.5	Y
Glover, Deval	1		0.5	Y
Goda, Masakazu	2		1	Y
Godsey, Brandon	1		0.5	Y
Goelabdien, Haroen	1		0.5	Y
Goetz, Ron	2		1	Y
Golliday, Aaron	1		0.5	Y
Golliday, Toby	2		1	Y
Gomez, Guillermo	2		1	Y
Gomez, Mike	1		0.5	Y
Gonzalez, Dan	1		0.5	Y
Goodman, Herbert	1	2	0.5	N
Goodwell, Tim	1		0.5	Y
Goodwin, Marvin	1		0.5	Y
Gordon, Cedric	1		0.5	Y
Gordon, Clemente	1		0.5	Y
Gordon, David	1		0.5	Y
Gordon, Joe	1		0.5	Y
Gordon, Tracy	1		0.5	Y
Grabisna, Erwin	1		0.5	Y
Grace, Steve	1	1	0.5	N
Graetz, Raphael	2		1	Y
Gragert, Brian	1		0.5	Y
Gragg, Harold	2		1	Y
Graham, Dan	1		0.5	Y
Graham, Jeff	1		0.5	Y
Graham, Lorenzo	1		0.5	Y
Grant, African	1	1	0.5	N
Grant, Eddie	2		1	Y
Grant, Michael	1		0.5	Y
Grant, Robert	1		0.5	Y
Grant, Troy	2		1	Y
Graves, Broderick	1		0.5	Y
Gray, Anthony	1		0.5	Y
Gray, Brian	1		0.5	Y
Gray, Jamie	2		1	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Gray, Oscar	1	1	0.5	N
Gray, Quinn	1	4	0.5	N
Gray, Terry	2		1	Y
Graybill, Mike	1	1	0.5	N
Green, Anthony	1		0.5	Y
Green, Cornell	1	8	0	N
Green, DeJuan	1		0.5	Y
Green, Gaston	1	5	0	N
Green, Jeff	1		0.5	Y
Green, Lamont	1	1	0.5	N
Green, Louis	1	5	0	N
Green, Roderick	1		0.5	Y
Green, Rogerick	1	3	0.5	N
Greene, Anthony	2		1	Y
Greene, Leonard	2		1	Y
Greene, Tirrell	1		0.5	Y
Greenfield, Brian	2		1	Y
Greenwood, Joe	2		1	Y
Greer, Daniel	1		0.5	Y
Gregersen, Marico	4		2	Y
Greisen, Chris	1	3	0.5	N
Grice, Shane	1	1	0.5	N
Grieb, Mark	1		0.5	Y
Grier, Daameon	1		0.5	Y
Grier, James	1		0.5	Y
Grier, Marrio	1	2	0.5	N
Grier, Profail	1		0.5	Y
Griffin, Pernell	1		0.5	Y
Griffin, Quentin	1	2	0.5	N
Grigsby, Otis	1	3	0.5	N
Grimes, Reggie	1	1	0.5	N
Groh, Michael	1		0.5	Y
Gronroos, Kari	1		0.5	Y
Gross-Pass, Peter	3		1.5	Y
Grot, Amilcar	1		0.5	Y
Grove, Kyle	1		0.5	Y
Gruden, Jay	2		1	Y
Grzeskowiak, Jeff	1		0.5	Y
Guardia, Matt	1		0.5	Y
Guenther, Eric	2		1	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Guerrero, Alex	1		0.5	Y
Guerrero, John	1		0.5	Y
Guest, Craig	1		0.5	Y
Guidry, Kevin	1	2	0.5	N
Guidry, Mickey	2		1	Y
Gumina, Scott	1		0.5	Y
Gunn, Lance	1	1	0.5	N
Gunn, Tony	1		0.5	Y
Gurley, Buck	1	1	0.5	N
Gustafsson, Jorgen	2		1	Y
Gustin, Billy	2		1	Y
Gutekunst, Samuel	3		1.5	Y
Guthrie, Sean	2		1	Y
Guy, Daniel	1		0.5	Y
Guynes, Thomas	2	1	1	N
Haase, Andy	1	1	0.5	N
Habermann, Frank	1		0.5	Y
Hackemack, Ken	1		0.5	Y
Haering, Chris	1		0.5	Y
Hagood, Jay	3	1	1.5	N
Hall, Ben	2		1	Y
Hall, Chris	4	1	2	N
Hall, Jason	1		0.5	Y
Hall, Joe	1		0.5	Y
Hall, Mike	1		0.5	Y
Hall, Ricky	2		1	Y
Hall, Robert	1		0.5	Y
Hall, Tramain	1		0.5	Y
Hall, Victor	1		0.5	Y
Halterman, Aaron	1	1	0.5	N
Ham, Derrick	1	2	0.5	N
Hambrick, Kenyon	1		0.5	Y
Hamdan, Gibran	3	4	1	N
Hamilton, Bobby	1	12	0	N
Hamilton, Joe	1	2	0.5	N
Hamilton, Kadar	1		0.5	Y
Hamiter, Uhuru	1	3	0.5	N
Hammel, Todd	1		0.5	Y
Hammerschmidt, Jeff	1		0.5	Y
Hammond, Vance	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Hamoudi, Samyr	5		2.5	Y
Hampel, Olaf	5		2.5	Y
Hampton, Alonzo	2		1	Y
Hand, Omari	1	1	0.5	N
Hanks, Ben	1	2	0.5	N
Hanna, Jim	1	1	0.5	N
Hannah, Nick	1		0.5	Y
Hannah, Travis	1	3	0.5	N
Hanoian, Greg	1		0.5	Y
Harbour, Dave	2	2	1	N
Hardaway, Eddie	1		0.5	Y
Harden, Cedric	1	1	0.5	N
Harden, Michael	1	1	0.5	N
Hardin, Travis	1		0.5	Y
Hardmon, Byron	3		1.5	Y
Hardy, Anthony	1		0.5	Y
Hardy, Jermaine	1	1	0.5	N
Hardy, John	1	1	0.5	N
Hare, Brian	1		0.5	Y
Hare, Stuart	2		1	Y
Hargrave, James	1		0.5	Y
Hargrove, Marvin	1	1	0.5	N
Hargrove, Reggie	1		0.5	Y
Harley, David	1		0.5	Y
Harmon, Eric	1		0.5	Y
Harmon, Jason	1		0.5	Y
Harney, Kenny	1		0.5	Y
Harper, James	1		0.5	Y
Harper, Shawn	2	1	1	N
Harrell, Chris	1		0.5	Y
Harrell, Gary	1	1	0.5	N
Harrell, Greg	1		0.5	Y
Harriott, Claude	1		0.5	Y
Harris, A.J.	1		0.5	Y
Harris, Aaron	1		0.5	Y
Harris, Bobby	1		0.5	Y
Harris, Brad	1		0.5	Y
Harris, Darryl	2	1	1	N
Harris, Elliott	1		0.5	Y
Harris, Elroy	2	1	1	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Harris, Erick	2		1	Y
Harris, George	3		1.5	Y
Harris, Gerald	1		0.5	Y
Harris, Ike	1		0.5	Y
Harris, Jeff	1		0.5	Y
Harris, Jon	1	2	0.5	N
Harris, Kelvin	1		0.5	Y
Harris, Kenny	1	1	0.5	N
Harris, Lee	1		0.5	Y
Harris, Michael	1	1	0.5	N
Harris, Rashad	2		1	Y
Harris, Sterling	1		0.5	Y
Harris, Steven	1		0.5	Y
Harris, Travis	1		0.5	Y
Harris, Willie	1		0.5	Y
Harris, Wyatt	1		0.5	Y
Harrison, Kevin	1	1	0.5	N
Harrison, Tony	2		1	Y
Hart, Clinton	1	7	0	N
Hart, Lawrence	1	1	0.5	N
Hart, Rob	7		3.5	Y
Hartsell, Mark	1	1	0.5	N
Harvey, Jasper	1		0.5	Y
Harvey, Stacy	1	1	0.5	N
Hasegawa, Syoei	1		0.5	Y
Hastings, Gavin	1		0.5	Y
Hatcher, Armon	2	1	1	N
Hatega, Francis	1		0.5	Y
Hatzky, Wolfgang	1		0.5	Y
Haw, Brandon	1		0.5	Y
Hawkes, Michael	1	2	0.5	N
Hawkins, Ahmad	1		0.5	Y
Hawkins, Joey	1		0.5	Y
Hawkins, Phil	1		0.5	Y
Hay, Shawn	1		0.5	Y
Hayes, Chad	2		1	Y
Hayes, Joseph	1		0.5	Y
Hayes, Lionel	1		0.5	Y
Haygood, Herb	1	1	0.5	N
Haynes, Alex	1	2	0.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Haynes, Jesse	2		1	Y
Hazuga, Jeff	1	1	0.5	N
Heckenbach, Jörg	8		4	Y
Heidenreich, Jon	1		0.5	Y
Heimbürger, Craig	1	2	0.5	N
Heiner, Jamie	1		0.5	Y
Heinonen, Eero	1		0.5	Y
Helfman, Marcus	2		1	Y
Helms, Gabriel	1		0.5	Y
Henderson, Joe	1		0.5	Y
Henderson, Taurean	1		0.5	Y
Hendricks, Bart	1		0.5	Y
Hendricks, Carlos	1		0.5	Y
Hendrix, Kevin	2		1	Y
Henke, Brad	1	1	0.5	N
Henry, Cedric	1		0.5	Y
Henry, Charles	1	1	0.5	N
Henry, James	2		1	Y
Henry, Keron	1		0.5	Y
Henry, Mario	1		0.5	Y
Henry, William	1		0.5	Y
Henson, Drew	1	3	0.5	N
Henton, Anthony	2	2	1	N
Hernandez, Adam	1		0.5	Y
Herndon, Kelly	1	6	0	N
Herrell, Ben	2		1	Y
Herrington, Harvie	1		0.5	Y
Herrion, Atlas	1		0.5	Y
Herrion, Thomas	1		0.5	Y
Herzing, Adam	2		1	Y
Hess, Bill	1		0.5	Y
Hesse, Jon	2	1	1	N
Heuer, Norman	2		1	Y
Hewitt, Andre	2		1	Y
Heyer, Peter	5		2.5	Y
Heyward-Johnson, Keith	1		0.5	Y
Hickerson, Eric	1		0.5	Y
Hickl, Matthew	1		0.5	Y
Hicks, Anthony	1		0.5	Y
Hicks, Jordan	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Hicks, Kerry	1	1	0.5	N
Hicks, Maurice	1	5	0	N
Hicks, Michael	1		0.5	Y
Hicks, Reese	1		0.5	Y
Hicks, Skip	1	4	0.5	N
Higgins, Robert	1		0.5	Y
Hilbert, Jon	1	2	0.5	N
Hill, Charles	1	1	0.5	N
Hill, Derek	2	2	1	N
Hill, Eric	1		0.5	Y
Hill, James	1	1	0.5	N
Hill, Madre	1	2	0.5	N
Hill, Marcus	1		0.5	Y
Hill, Matt	1	2	0.5	N
Hill, Nate	2	1	1	N
Hill, Shelby	1		0.5	Y
Hilliard, Cedric	1		0.5	Y
Hillman, Jay	1		0.5	Y
Hilton, Isaac	1		0.5	Y
Himebauch, Jonathan	2		1	Y
Hinchcliff, Willie	1		0.5	Y
Hines, Clarkston	1		0.5	Y
Hinnant, Mike	1	3	0.5	N
Hinton, Marcus	1	1	0.5	N
Hinton, Patrick	1		0.5	Y
Hippler, Werner	11		5	Y
Hiruma, Shingo	2		1	Y
Hoag, Ryan	1		0.5	Y
Hobbs, Ed	1		0.5	Y
Hodge, Milford	1	4	0.5	N
Hodges, Howard	1		0.5	Y
Hoelscher, David	3	1	1.5	N
Hoffman, Jim	1		0.5	Y
Hoffman, Ryan	2		1	Y
Hoffmann, Augie	1		0.5	Y
Hoffmann, Dave	1	1	0.5	N
Hofland, Mark	1		0.5	Y
Hogan, Chauncey	1		0.5	Y
Hogans, Richard	2		1	Y
Hogg, Matthew	2		1	Y

Eligible Seasons Added by Credit for NFL Europe

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Holcomb, Kelly	1	9	0	N
Holder, Rod	1		0.5	Y
Holland, John Robert	2		1	Y
Holleman, Chad	1		0.5	Y
Hollenbeck, Joey	1		0.5	Y
Holliday, Tommy	1		0.5	Y
Hollings, Tony	1	3	0.5	N
Holloway, Brian	1	8	0	N
Holloway, Derek	1	2	0.5	N
Holm, Joakim	1		0.5	Y
Holmes, Brian	1		0.5	Y
Holmes, Darryl	2	3	1	N
Holt, Cedrick	1		0.5	Y
Holt, Reggie	1		0.5	Y
Homer, Derek	1		0.5	Y
Homer, Kevin	1		0.5	Y
Hood, Kerry	1		0.5	Y
Hooven, Owen	1		0.5	Y
Hope, Charles	1	1	0.5	N
Hopkins, Mark	2		1	Y
Hopkins, Tam	1	1	0.5	N
Hori, Ryota	2		1	Y
Horie, Nobutaka	1		0.5	Y
Horiguchi, Yasushi	1		0.5	Y
Horne, Greg	2	2	1	N
Horton, Jon	1		0.5	Y
Hosack, Aaron	3		1.5	Y
Hotchkiss, Josh	1		0.5	Y
Houchin, Thomas	1		0.5	Y
House, Kevin	2	2	1	N
Houston, Artis	1		0.5	Y
Houston, Samario	1		0.5	Y
Howard, Abdual	2		1	Y
Howard, Bobbie	1	3	0.5	N
Howard, Dana	1	2	0.5	N
Howard, Edwin	1		0.5	Y
Howard, James	1		0.5	Y
Howard, Todd	2		1	Y
Howard, Todd	2	1	1	N
Howe, Garry	3	3	1.5	N

Eligible Seasons Added by Credit for NFL Europe

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Howell, Evan	1		0.5	Y
Hoyem, Steve	1	1	0.5	N
Hoyle, Wilson	1		0.5	Y
Hoyte, Nigel	1		0.5	Y
Huckestein, Ray	1		0.5	Y
Hudson, Craig	1		0.5	Y
Hudson, Gerald	1		0.5	Y
Huerta, Carlos	1	1	0.5	N
Huff, Richard	1		0.5	Y
Huggins, Felton	1	1	0.5	N
Hughes, Connor	1		0.5	Y
Hughes, Darren	1		0.5	Y
Humes, Cedric	1		0.5	Y
Humphery, Bobby	1	7	0	N
Humphrey, Aaron	1		0.5	Y
Humphrey, Jay	1		0.5	Y
Hunt, Aaron	1		0.5	Y
Hunt, Jack	1	1	0.5	N
Hunt, Purvis	3		1.5	Y
Hunt, Reggie	1		0.5	Y
Hunt, Robert	1		0.5	Y
Hunt, Robert	2		1	Y
Hunter, Arthur	2		1	Y
Hunter, Dameon	1	1	0.5	N
Hunter, Earnest	1	2	0.5	N
Hunter, Hugh	2		1	Y
Hunter, Jeff	2	5	0	N
Hunter, Malvin	1		0.5	Y
Hunter, Torey	1	1	0.5	N
Hunter, Wendell	1		0.5	Y
Hunter, Will	1	2	0.5	N
Hurst, Kevin	1		0.5	Y
Hurtado, Jonathan	2		1	Y
Husak, Todd	1	1	0.5	N
Husar, Mike	2		1	Y
Husby, John	1		0.5	Y
Hutchinson, Stephen	4		2	Y
Hutton, Trevor	1	1	0.5	N
Hybl, Nate	1	1	0.5	N
Hyder, Gaylon	1	2	0.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Hyllienmark, John	1		0.5	Y
Icsman, Don	1		0.5	Y
Ikenoue, Takahiro	2		1	Y
Ilic, Vladimir	4		2	Y
Imbernon, Ivan	5		2.5	Y
Imoto, Yoshinobu	1		0.5	Y
Ingoglia, Rene	1		0.5	Y
Ingram, Jonathan	1	1	0.5	N
Inkrott, Mark	1		0.5	Y
Irvin, Sedrick	1	2	0.5	N
Isabelle, Yubrenal	2		1	Y
Ishida, Rikiya	4		2	Y
Ishola, Ben	1		0.5	Y
Ismaeli, Hudhaifa	1		0.5	Y
Ismail, Hesham	1		0.5	Y
Israel, Ron	1	1	0.5	N
Issa, Jabari	1	2	0.5	N
Itai, Masato	3		1.5	Y
Ito, Shigemasa	1		0.5	Y
Ivanov, Sergey	3		1.5	Y
Ivory, Clifford	1		0.5	Y
Ivy, Corey	1	9	0	N
Ivy, Greg	1		0.5	Y
Ivy, Khorl	1		0.5	Y
Jacas, Andrew	1		0.5	Y
Jackson, Bobby	1		0.5	Y
Jackson, Charles	2		1	Y
Jackson, Chris	1		0.5	Y
Jackson, Harry	2		1	Y
Jackson, Jabari	1		0.5	Y
Jackson, Jerry	1		0.5	Y
Jackson, Joe	1		0.5	Y
Jackson, Jonathan	1	1	0.5	N
Jackson, Junior	2		1	Y
Jackson, Kenny	2		1	Y
Jackson, Larry	1		0.5	Y
Jackson, Les	1		0.5	Y
Jackson, Mario	1		0.5	Y
Jackson, Marlion	1	1	0.5	N
Jackson, Orsorio	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Jackson, Pasha	1		0.5	Y
Jackson, Patrick	1		0.5	Y
Jackson, Ray	1	1	0.5	N
Jackson, Ray	1		0.5	Y
Jackson, Ray	2		1	Y
Jackson, Robert	1		0.5	Y
Jackson, Tim	1	1	0.5	N
Jackson, Vershan	1		0.5	Y
Jacobs, Joel	1		0.5	Y
Jacobs, John	1		0.5	Y
Jacobs, Omar	1		0.5	Y
James, Cedric	1	1	0.5	N
James, Tim	1		0.5	Y
James, Walter	1		0.5	Y
Jamison, Jermaine	1		0.5	Y
Jasmin, Marcus	1		0.5	Y
Jeffcoat, Jerold	2		1	Y
Jefferson, Ben	1	1	0.5	N
Jefferson, Kevin	1	2	0.5	N
Jeffery, Tony	1	1	0.5	N
Jemison, Mike	1		0.5	Y
Jenkins, A.J.	2	2	1	N
Jenkins, J.R.	1	1	0.5	N
Jenkins, Keith	1		0.5	Y
Jenkins, Mike	1	1	0.5	N
Jennings, Ligarius	1	2	0.5	N
Jennings, Michael	1	1	0.5	N
Jensen, Erik	1		0.5	Y
Jensen, Mark	1		0.5	Y
Jeromin, Christoph	1		0.5	Y
Jimenez, Jason	2		1	Y
Jimerson, A.J.	1	2	0.5	N
Joder, Helmut	1		0.5	Y
Johansson, Jesper	1		0.5	Y
John-Lewis, Kelly	1		0.5	Y
Johnson, Aaron	1		0.5	Y
Johnson, Albert	1	2	0.5	N
Johnson, Alonzo	2	1	1	N
Johnson, Andre	1		0.5	Y
Johnson, Ben	2		1	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Johnson, Brian	1		0.5	Y
Johnson, Chuckie	2	1	1	N
Johnson, Clyde	1	1	0.5	N
Johnson, Dwight	1	2	0.5	N
Johnson, Earvin	1		0.5	Y
Johnson, Emmett	1		0.5	Y
Johnson, James	1		0.5	Y
Johnson, Jaret	1		0.5	Y
Johnson, Jarrod	1		0.5	Y
Johnson, Jason	1		0.5	Y
Johnson, Jason	2	2	1	N
Johnson, Joe	1		0.5	Y
Johnson, Joe	1		0.5	Y
Johnson, Joe	1		0.5	Y
Johnson, Juan	1		0.5	Y
Johnson, Kenton	1		0.5	Y
Johnson, Loren	1		0.5	Y
Johnson, Marty	1		0.5	Y
Johnson, Maurice	1	4	0.5	N
Johnson, Mike	1		0.5	Y
Johnson, Mike	2		1	Y
Johnson, Paris	1		0.5	Y
Johnson, Rashee	1		0.5	Y
Johnson, Riall	1	3	0.5	N
Johnson, Ricky	2		1	Y
Johnson, Steve	1		0.5	Y
Johnson, Teyo	1	3	0.5	N
Johnson, Tommy	1	1	0.5	N
Johnson, Tyrone	1	1	0.5	N
Johnson, Undra	1	1	0.5	N
Johnson, Wayne	1		0.5	Y
Jolly, Terry	1		0.5	Y
Jones, Adrian	2		1	Y
Jones, C.J.	2		1	Y
Jones, Carlos	1		0.5	Y
Jones, Chris	1		0.5	Y
Jones, Daniel	1		0.5	Y
Jones, David	2	1	1	N
Jones, David	1		0.5	Y
Jones, Dewaine	2		1	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Jones, Dwuane	1		0.5	Y
Jones, Eric	1		0.5	Y
Jones, Ernest	1		0.5	Y
Jones, Ernie	1	6	0	N
Jones, J.J.	1	1	0.5	N
Jones, Jim	1		0.5	Y
Jones, John	1		0.5	Y
Jones, Khari	1		0.5	Y
Jones, Larry	2		1	Y
Jones, Lee	1		0.5	Y
Jones, Maurice	1		0.5	Y
Jones, Myron	1		0.5	Y
Jones, Ontei	1		0.5	Y
Jones, Preston	2		1	Y
Jones, Quintin	2	2	1	N
Jones, Reggie	1	3	0.5	N
Jones, Richard	1	1	0.5	N
Jones, Shannon	2		1	Y
Jones, Thomas	2		1	Y
Jones, Tim	1		0.5	Y
Jones, Todd	1	1	0.5	N
Jones, Tony	2	4	1	N
Jones, Tony	2		1	Y
Jones, Tyler	1		0.5	Y
Jones, Tyrone	1	1	0.5	N
Jonsson, Michael	3		1.5	Y
Jordan, Brian	1		0.5	Y
Jordan, Sean	1		0.5	Y
Joseph, Carlos	1		0.5	Y
Joseph, Dale	1		0.5	Y
Joseph, Kerry	1	4	0.5	N
Joseph, Vance	1	2	0.5	N
Jowers, Jason	1		0.5	Y
Joyce, Eric	1	1	0.5	N
Juhnke, Hans	1		0.5	Y
Jurineack, Terrell	2		1	Y
Kaaiohelo, Jared	2		1	Y
Kacmarynski, Marc	2		1	Y
Kahui, Kurt	1		0.5	Y
Kaleita, Tom	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Kalich, Ryan	2		1	Y
Kalombo, Kubanai	1		0.5	Y
Kancel, Patrice	4		2	Y
Kane, Morgan	1		0.5	Y
Karg, Terry	2		1	Y
Kashama, Alain	1	2	0.5	N
Kasowski, Steve	1		0.5	Y
Kaufusi, Doug	2		1	Y
Kaufusi, Steve	1	2	0.5	N
Kauric, Jerry	1	1	0.5	N
Kawaguchi, Masafumi	7		3.5	Y
Kazadi, Muadianvita	1	1	0.5	N
Kazar, Jason	1		0.5	Y
Kearney, Jay	1		0.5	Y
Keen, Robbie	1		0.5	Y
Keen, Warren	1		0.5	Y
Keenan, Sean	1	1	0.5	N
Keeney, Brad	3	1	1.5	N
Kehl, Ed	1		0.5	Y
Keith, Dustin	2		1	Y
Kelchner, Jake	1		0.5	Y
Kelley, Matt	1		0.5	Y
Kelley, Mike	1	2	0.5	N
Kellogg, Jack	2		1	Y
Kelly, Andy	2		1	Y
Kelly, Jermale	1		0.5	Y
Kelson, Derrick	1		0.5	Y
Kempchen, Andreas	1		0.5	Y
Kendrick, Donta	2		1	Y
Kennedy, Larry	1		0.5	Y
Kenney, Marchant	1		0.5	Y
Kern, Kenny	1		0.5	Y
Kerr, Mike	2		1	Y
Keys, Isaac	1	2	0.5	N
Khayat, Bill	1		0.5	Y
Kibble, Jimmy	1		0.5	Y
Kidd, James	2		1	Y
Kight, Danny	2	3	1	N
Kight, Kelvin	1	2	0.5	N
Kilian, James	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Killeen, Ryan	1		0.5	Y
Killings, Cedric	1	6	0	N
Killion, Kyle	1		0.5	Y
Kimball, David	1		0.5	Y
Kimrin, Ola	3	1	1.5	N
Kincade, Keylon	1	1	0.5	N
King, Andy	1	2	0.5	N
King, Buddy	1		0.5	Y
King, Emanuel	1	5	0	N
King, Eric	1		0.5	Y
King, Jerome	1		0.5	Y
King, Kenny	1	1	0.5	N
King, Michael	1		0.5	Y
King, Thomas	2		1	Y
King, Tyler	2		1	Y
Kingsbury, Kliff	1	1	0.5	N
Kinoshita, Noriaki	3		1.5	Y
Kipps, Kyle	1		0.5	Y
Kirkpatrick, Kirk	1		0.5	Y
Kirksey, Jon	5	1	2.5	N
Kirksey, William	1	1	0.5	N
Kiselak, Mike	2	1	1	N
Kittner, Kurt	1	1	0.5	N
Klabo, Chuck	1		0.5	Y
Kleinhesselink, Riley	1		0.5	Y
Kleinmann, Ralf	8		4	Y
Klemic, Dave	1		0.5	Y
Kloeth, Barry	2		1	Y
Knight, Shawn	1	3	0.5	N
Knox, Kevin	1	1	0.5	N
Kobdich, Josh	1		0.5	Y
Kobel, Craig	1		0.5	Y
Konner, Daniel	1		0.5	Y
Koonce, Richard	1		0.5	Y
Kostrewa, Jeff	1		0.5	Y
Koulen, Rick	2		1	Y
Krager, Dane	1		0.5	Y
Krein, Darren	1		0.5	Y
Kresser, Eric	1	1	0.5	N
Kroeker, Dustin	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Kronenberg, Bob	3		1.5	Y
Krumm, Todd	1	1	0.5	N
Kruse, Axel	5		2.5	Y
Kubiak, Jim	2		1	Y
Kubik, Brad	1		0.5	Y
Kuci, Kim	4		2	Y
Kugler, Sean	1		0.5	Y
Kuhn, Dominique	1		0.5	Y
Kuipers, Jason	1		0.5	Y
Kula, Bob	2		1	Y
Kupp, Craig	1	1	0.5	N
Kurpeikis, Justin	1	3	0.5	N
Kushner, Bill	1		0.5	Y
Kwaku, Edward	1		0.5	Y
Kwarta, Bret	1		0.5	Y
Lacey, Chonn	2		1	Y
Ladd, Anthony	1	1	0.5	N
LaFleur, Billy	1	2	0.5	N
Lafont, Xavier	1		0.5	Y
Lamb, Marc	2		1	Y
Lambert, Dion	1	3	0.5	N
Lammle, Wayne	1		0.5	Y
Lancaster, Sasha	2		1	Y
Lance, Carlton	1		0.5	Y
Landrom, Jamar	1		0.5	Y
Landrum, Vincent	1		0.5	Y
Landry, Michael	1		0.5	Y
Lane, Greg	1		0.5	Y
Lang, Olaf	1		0.5	Y
Langley, Aron	1		0.5	Y
Lano, Bastian	5		2.5	Y
LaRocca, Josh	2		1	Y
Larsen, Atle	1		0.5	Y
Larsen, Stephen	1		0.5	Y
LaSane, Bruce	1		0.5	Y
Laskowski, Chris	1		0.5	Y
Latka, Martin	4		2	Y
Laufenberg, Babe	1	4	0.5	N
Lay, Josh	1		0.5	Y
Layfield, John	1		0.5	Y

Eligible Seasons Added by Credit for NFL Europe

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Layow, Matt	1		0.5	Y
Leahy, Ryan	2		1	Y
Leatherwood, Frank	1		0.5	Y
LeBlanc, Clarence	2	1	1	N
Lebo, Brad	1		0.5	Y
Ledbetter, Mark	2		1	Y
Ledyard, Courtney	1	1	0.5	N
Lee, Alvin	1		0.5	Y
Lee, Darrell	2		1	Y
Lee, Greg	1		0.5	Y
Lee, Greg	2	1	1	N
Lee, James	1	1	0.5	N
Lee, Kevin	1	2	0.5	N
Lee, Mark	1		0.5	Y
Lee, Reginald	1		0.5	Y
Lee, Rob	1		0.5	Y
Lee, Steve	1		0.5	Y
Lefotu, Kili	1		0.5	Y
Leggett, Jerry	1		0.5	Y
Lenda, Tyler	3		1.5	Y
Lenseigne, Tony	1		0.5	Y
Lester, Marc	1		0.5	Y
Levake, Derrick	2		1	Y
Levey, Jabari	1		0.5	Y
Levy, Darcey	1		0.5	Y
Lewis, Chris	1		0.5	Y
Lewis, Darrell	1		0.5	Y
Lewis, Derrick	1	3	0.5	N
Lewis, Jacque	2		1	Y
Lewis, James	2		1	Y
Lewis, Jermaine	1		0.5	Y
Lewis, Jonas	1	2	0.5	N
Lewis, Kevin	1		0.5	Y
Lewis, Kip	2		1	Y
Lewis, Ron	2	1	1	N
Lewis, Scotty	1		0.5	Y
Li, Chaoran	1		0.5	Y
Lies, Michael	1		0.5	Y
Liess, Christopher	3		1.5	Y
Lightner, Kevin	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Ligon, Lemual	1		0.5	Y
Lillibridge, Marc	1		0.5	Y
Lilljedahl, Bobby	2		1	Y
Lindholm, Matti	1		0.5	Y
Lindstrom, Eric	3		1.5	Y
Lindstrom, Gabe	2		1	Y
Lira, Hugo	3		1.5	Y
Little, Derrick	1		0.5	Y
Little, George	2	3	1	N
Lloyd, DeAngelo	2		1	Y
Lockett, Charles	1	2	0.5	N
Lockett, Danny	2	2	1	N
Lockhart, Radell	3		1.5	Y
Lofton, Billy	1		0.5	Y
Logan, Phil	1		0.5	Y
Loggins, Jarett	2		1	Y
Long, Devan	1		0.5	Y
Long, Ding	1		0.5	Y
Long, Juan	3		1.5	Y
Lopez, Gerardo	1		0.5	Y
Lopez, Mauricio	3		1.5	Y
Lord, Junior	1		0.5	Y
Loredo, Cesar	2		1	Y
Lossow, Rodney	2		1	Y
Lott, James	1		0.5	Y
Louisdor, Mesene	1		0.5	Y
Love, Clarence	1	4	0.5	N
Love, Marvin	1		0.5	Y
Lowe, Reggie	1	1	0.5	N
Lowery, Bren	1		0.5	Y
Lowery, Michael	1	2	0.5	N
Lucas, Chad	1	2	0.5	N
Lukins, Tony	2		1	Y
Lulay, Travis	1		0.5	Y
Lumelski, Zev	1		0.5	Y
Lundqvist, Patrik	1		0.5	Y
Luneberg, Chris	3		1.5	Y
Luoto, Iiro	3		1.5	Y
Lyck, Kai-Erik	1		0.5	Y
Lyle, Win	1		0.5	Y

Eligible Seasons Added by Credit for NFL Europe

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Lynch, Ben	1	4	0.5	N
Lynch, Eric	1	5	0	N
Lynch, Shawn	1	1	0.5	N
Lytle, Dean	1		0.5	Y
Ma'afala, Nick	1		0.5	Y
Mabry, Mike	2		1	Y
Macik, Miles	1		0.5	Y
Mack, Gerald	1		0.5	Y
Mack, Kendell	2		1	Y
Mack, Rico	2	1	1	N
MacKenzie, Tony	2		1	Y
Maddox, Andre	1		0.5	Y
Maggio, Kirk	2		1	Y
Mahdavi, Ben	1		0.5	Y
Majondo-Mwamba, Patrice	3		1.5	Y
Makinen, Markku	1		0.5	Y
Malan, Mike	2		1	Y
Malano, Mike	1		0.5	Y
Malbrough, Anthony	1	1	0.5	N
Malecki, Jason	1		0.5	Y
Mallard, DeShone	2		1	Y
Mallard, Josh	1	4	0.5	N
Malm, Cristian	3		1.5	Y
Malo, Gregoire	3		1.5	Y
Malone, Antonio	1		0.5	Y
Malone, Art	1		0.5	Y
Malone, Toderick	2		1	Y
Malone, Tom	1		0.5	Y
Malveaux, Kelly	1		0.5	Y
Manca, Massimo	1	1	0.5	N
Mance, Brian	1		0.5	Y
Mandley, Pete	1	7	0	N
Manning, Roderick	1		0.5	Y
Manns, Denvis	2		1	Y
Manuel, Lionel	1	7	0	N
Manuel, Sam	1		0.5	Y
Manuel, Sean	1	1	0.5	N
Maranto, Tony	2		1	Y
Marceline, Laurent	4		2	Y
Marcos, Xisco	3		1.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Marlatt, Pat	2		1	Y
Marrone, Doug	2	2	1	N
Marrow, Vince	2	1	1	N
Marshall, Keyonta	1	1	0.5	N
Martin, Demetrice	1		0.5	Y
Martin, Emerson	2	1	1	N
Martin, Jamie	1	10	0	N
Martin, Jason	1		0.5	Y
Martin, Jimmy	1		0.5	Y
Martin, Ruvell	1	7	0	N
Martin, Tee	1	3	0.5	N
Martin, Tim	1		0.5	Y
Martinez, Arturo	1		0.5	Y
Martini, Ralph	1		0.5	Y
Martos, Diego	2		1	Y
Martos, Marco	8		4	Y
Martz, Daniel	1		0.5	Y
Maslo, Stephan	1		0.5	Y
Mason, Michael	2		1	Y
Massey, Sam	1		0.5	Y
Massey, Tony	1		0.5	Y
Massimiani, John	1		0.5	Y
Mastrole, Ken	1		0.5	Y
Mathes, Andre	2		1	Y
Matla, Pascal	1		0.5	Y
Matthews, Adam	1		0.5	Y
Matthews, Roshaun	1		0.5	Y
Matthews, Steve	1	2	0.5	N
Matusz, Roman	1		0.5	Y
May, Chad	1	1	0.5	N
Maye, Mark	1		0.5	Y
Mayer, Shawn	3	2	1.5	N
Mayers, Lorn	2		1	Y
Mayfield, Corey	1	2	0.5	N
Mayfield, Curtis	1		0.5	Y
Mayo, Lyneil	1		0.5	Y
Mays, Jermaine	2		1	Y
McAda, Ronnie	1		0.5	Y
McAllister, Bobby	2		1	Y
McAlmont, Kevin	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
McArthur, Kevin	1	4	0.5	N
McBrien, Scott	1		0.5	Y
McCall, Kris	1		0.5	Y
McCall, Matt	1		0.5	Y
McCallum, Paul	1		0.5	Y
McCann, Kyle	1		0.5	Y
McCarthy, Mike	1		0.5	Y
McChesney, Matt	1	2	0.5	N
McClanahan, Anthony	1		0.5	Y
McCleary, Norris	1	2	0.5	N
McClellion, Central	1	1	0.5	N
McCorvey, Kez	1	3	0.5	N
McCoy, Derek	1		0.5	Y
McCoy, Ivory	3		1.5	Y
McCoy, Keith	1		0.5	Y
McCoy, Mike	2		1	Y
McCoy, Ryan	1		0.5	Y
McCray, Antwon	1		0.5	Y
McCready, Scott	6		3	Y
McCree, Charles	1		0.5	Y
McCullar, Kevin	1		0.5	Y
McCullough, Andy	1	1	0.5	N
McCullough, Carl	1		0.5	Y
McCullough, Edorian	1		0.5	Y
McCullough, Jake	1	2	0.5	N
McCullough, Russ	2		1	Y
McCullum, Justin	1		0.5	Y
McDaniel, Curtis	1		0.5	Y
McDaniel, Kenneth	1		0.5	Y
McDaniels, Pellom	2	7	0	N
McDaniels, Terry	1		0.5	Y
McDonald, Brian	2		1	Y
McDonald, LaMarcus	1		0.5	Y
McDonald, Sameeh	1		0.5	Y
McDougal, Kevin	1		0.5	Y
McElmurry, Blaine	2	3	1	N
McElroy, Jim	1		0.5	Y
McEndoo, Jason	1	1	0.5	N
McEntyre, Kenny	4		2	Y
McEwen, Craig	1	5	0	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
McFarland, Dylan	1	2	0.5	N
McGann, Mike	1		0.5	Y
McGaughey, Thomas	1		0.5	Y
McGee, Curtis	2		1	Y
McGee, Dell	1	1	0.5	N
McGee, Don	1		0.5	Y
McGeoghan, Phil	1	1	0.5	N
McGhghy, Matt	1		0.5	Y
McGill, Curt	1		0.5	Y
McGill, Darryl	1		0.5	Y
McGill, Karmeeleyah	2	1	1	N
McGowan, Paul	2		1	Y
McGrew, Brock	1		0.5	Y
McGrew, Sam	1		0.5	Y
McGruder, Lynn	1		0.5	Y
McGuire, Kaipō	1	2	0.5	N
McGuirk, Pat	2		1	Y
McIntyre, Corey	2	8	0	N
McIntyre, Jeris	1		0.5	Y
McKenzie, Damonte	2		1	Y
McKenzie, Kevin	1	1	0.5	N
McKibben, Josh	1		0.5	Y
McKinney, Anthony	1		0.5	Y
McLemore, Chris	1	2	0.5	N
McLeod, Kevin	1	2	0.5	N
McMahon, Pete	1		0.5	Y
McManus, Curtis	1		0.5	Y
McMeans, Tyler	1		0.5	Y
McMullen, Kirk	1	1	0.5	N
McNair, Fred	1		0.5	Y
McNeil, Nick	1		0.5	Y
McNutt, Antoine	1		0.5	Y
McPhatter, Brian	1		0.5	Y
McSeed, Larry	1		0.5	Y
McWashington, Shawn	1		0.5	Y
McWilliams, Jason	1		0.5	Y
McWright, Robert	2		1	Y
Meeks, Bob	1	1	0.5	N
Meerten, Joe	1		0.5	Y
Meeuwsen, Mitch	1		0.5	Y

Eligible Seasons Added by Credit for NFL Europe

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Megna, Marc	1	1	0.5	N
Meijer, Niels	3		1.5	Y
Meine, Ole	2		1	Y
Mendenhall, Mike	1		0.5	Y
Mensah, Akwasi	2		1	Y
Merandi, John	1		0.5	Y
Mercer, Ivan	1		0.5	Y
Meredith, Dion	1		0.5	Y
Merrill, Than	2	1	1	N
Merritt, David	1	3	0.5	N
Messmer, Frank	3		1.5	Y
Metcalf, Terrance	1		0.5	Y
Meyer, Erik	1		0.5	Y
Michals, Jon	1		0.5	Y
Mickel, Jeff	2	1	1	N
Mickey, Joey	1	1	0.5	N
Mickles, Joe	2	2	1	N
Middleton, Brandon	1	2	0.5	N
Middleton, Mike	2		1	Y
Mikolas, Doug	2	2	1	N
Milanovich, Scott	1	1	0.5	N
Miles, Barron	1		0.5	Y
Miles, Jermaine	1		0.5	Y
Miller, Ben	1		0.5	Y
Miller, Brandon	1	1	0.5	N
Miller, Bronzell	1	1	0.5	N
Miller, Brook	1		0.5	Y
Miller, Chris	1		0.5	Y
Miller, Craig	1	1	0.5	N
Miller, David	1		0.5	Y
Miller, Doug	1		0.5	Y
Miller, Jeff	1		0.5	Y
Miller, John	2	2	1	N
Miller, Keith	1	2	0.5	N
Miller, Kevin	1		0.5	Y
Miller, Marquet	1		0.5	Y
Miller, Matt	1		0.5	Y
Miller, Norman	1		0.5	Y
Miller, Romaro	1	1	0.5	N
Miller, Scott	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Miller-Lopez, Jason	2		1	Y
Mills, Javor	1	1	0.5	N
Mills, Lamar	1	1	0.5	N
Mills, Shawn	1		0.5	Y
Mills, Toby	2		1	Y
Minardi, John	1		0.5	Y
Miree, Brandon	1	1	0.5	N
Missant, Charles	2		1	Y
Missouri, Dwayne	1	1	0.5	N
Mitchel, Eric	1		0.5	Y
Mitchell, Barry	1		0.5	Y
Mitchell, Ben	1		0.5	Y
Mitchell, Clint	2		1	Y
Mitchell, Corey	1		0.5	Y
Mitchell, Deon	1		0.5	Y
Mitchell, Derrell	1	1	0.5	N
Mitchell, Hardy	1		0.5	Y
Mitchell, Lonny	1		0.5	Y
Mitchell, Qasim	1	3	0.5	N
Mitchell, Shirdonya	1	1	0.5	N
Mitchell, Shon	1		0.5	Y
Mitrione, Matt	1	1	0.5	N
Mittendorf, Alexej	1		0.5	Y
Mizuguchi, Takao	1		0.5	Y
Moa, Ben	2		1	Y
Mobley, Stacey	1	2	0.5	N
Mock, Kerry	1		0.5	Y
Moe, Tanuvasa	1		0.5	Y
Mohr, Christian	4		2	Y
Molly, Leo	2		1	Y
Monds, Mario	1	2	0.5	N
Monroe, Derrius	1		0.5	Y
Montgomery, Justin	1		0.5	Y
Montgomery, Shane	1		0.5	Y
Moody, Mike	3		1.5	Y
Moody, Thomas	1		0.5	Y
Moore, Andrew	1		0.5	Y
Moore, Chazz	1		0.5	Y
Moore, Curtis	1		0.5	Y
Moore, Darryl	1	1	0.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Moore, Freddie	2		1	Y
Moore, Josh	1		0.5	Y
Moore, Keon	1		0.5	Y
Moore, Mark	2	1	1	N
Moore, Otis	2		1	Y
Moore, Rod	1		0.5	Y
Moore, Tim	1		0.5	Y
Moorer, Pat	2		1	Y
Moran, Ron	1		0.5	Y
Moreau, Frank	1	2	0.5	N
Moreira, Tom	1		0.5	Y
Moreland, Earthwind	1	3	0.5	N
Moretti, Dave	1		0.5	Y
Morey, Sean	1	9	0	N
Morgan, Shawn	2		1	Y
Morgan, Tim	1		0.5	Y
Moronkola, Dee	1		0.5	Y
Morris, Alex	1		0.5	Y
Morris, Carl	2		1	Y
Morris, Cree	1		0.5	Y
Morris, Horace	2		1	Y
Morris, Lee	2	1	1	N
Mortensen, Todd	1		0.5	Y
Morton, Brian	1		0.5	Y
Morton, Craig	1		0.5	Y
Morton, John	1		0.5	Y
Mose, Diriki	1		0.5	Y
Mosley, Denorse	1		0.5	Y
Moss, Brent	1	1	0.5	N
Moss, Eric	1		0.5	Y
Moss, Tony	1		0.5	Y
Moss, Tristan	3		1.5	Y
Motzkus, Andreas	4		2	Y
Mounts, Rod	1		0.5	Y
Movassaghi, Babek	3		1.5	Y
Moxley, Tim	1		0.5	Y
Mraz, Mark	1	2	0.5	N
Mudge, David	1		0.5	Y
Muhammad, Victor	6		3	Y
Muirbrook, Shay	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Mulcahy, Sean	2		1	Y
Mull, Curt	2		1	Y
Mullin, R.C.	1		0.5	Y
Munch, John	1		0.5	Y
Munoz, Jose	2		1	Y
Muraoka, George	1		0.5	Y
Murphy, Chaz	1		0.5	Y
Murphy, Jason	1		0.5	Y
Murphy, Jim	1		0.5	Y
Murphy, Mark	1		0.5	Y
Murphy, Nick	1	2	0.5	N
Murphy, Rob	1	3	0.5	N
Murphy, Yo	2	3	1	N
Murray, Cal	2		1	Y
Murray, Dan	1	1	0.5	N
Murray, Leon	1		0.5	Y
Musinski, Rich	2		1	Y
Mustafa, Isaiah	1		0.5	Y
Muther, Pete	1		0.5	Y
Mutryn, Scott	1		0.5	Y
Mutti, Paolo	1		0.5	Y
Myers, Ryan	1	2	0.5	N
Myers, Shannon	1		0.5	Y
Myers, Wood	1		0.5	Y
Nagurski, Steffen	1		0.5	Y
Najarian, Pete	2	3	1	N
Nakajima, Yu	2		1	Y
Nakamura, Tamon	2		1	Y
Namiki, Kentaro	2		1	Y
Naposki, Eric	4	2	2	N
Nash, Keyon	1	1	0.5	N
Nazel, Omar	2		1	Y
Nelson, Corey	1		0.5	Y
Nelson, Reggie	2	2	1	N
Nerys, Jason	1		0.5	Y
Nettles, Mike	2		1	Y
Neunzig, Rene	1		0.5	Y
Nevadomsky, Jason	1		0.5	Y
Newberry, Jared	1		0.5	Y
Newbill, Richard	4	3	2	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Newell, Mike	1	1	0.5	N
Newhouse, Reggie	1	2	0.5	N
Newman, Adam	1		0.5	Y
Newman, David	1		0.5	Y
Newsom, Tony	2	1	1	N
Newsome, Myron	2		1	Y
Newsome, Richard	1	1	0.5	N
Newson, James	1		0.5	Y
Newton, Brandon	2		1	Y
Newton, Falanda	2		1	Y
Newton, Levi	1		0.5	Y
Ngaue, Alex	1		0.5	Y
Nichols, Ben	1		0.5	Y
Nichols, Gerald	1	6	0	N
Nichols, Jerome	1		0.5	Y
Nicholson, Calvin	1	2	0.5	N
Nicks, Ronnie	1		0.5	Y
Nicolson, Jeff	2		1	Y
Nienhuis, Doug	1	1	0.5	N
Nies, John	2	1	1	N
Niklos, J.R.	3		1.5	Y
Nimmo, Lance	1		0.5	Y
Nittmo, Bjorn	2	1	1	N
Nivens, Damon	2		1	Y
Nnabuife, Alvin	1		0.5	Y
Noa, Kaulana	1		0.5	Y
Noble, Brandon	1	6	0	N
Noble, Derek	1		0.5	Y
Noel, Kevin	1		0.5	Y
Noel, Tori	1		0.5	Y
Nord, Kendrick	1		0.5	Y
Norman, Dempsey	2		1	Y
Norseth, Mike	1	1	0.5	N
North, Ramondo	1		0.5	Y
Novak, Jeff	2	5	0	N
Nowland, Ben	2		1	Y
Nua, Mark	1		0.5	Y
Nugent, David	1	3	0.5	N
Nummi, Jukka-Pekka	1		0.5	Y
Nuno, Carlos	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Nussmeier, Doug	1	2	0.5	N
O'Brien, Joe	1		0.5	Y
O'Brien, Kevin	2		1	Y
O'Brien, Nick	1		0.5	Y
O'Connor, Adam	1		0.5	Y
O'Connor, Drew	1		0.5	Y
O'Connor, Sean	1		0.5	Y
O'Donnell, Joe	2		1	Y
O'Hara, Pat	1		0.5	Y
O'Neal, Matt	1		0.5	Y
O'Neal, Robert	3	1	1.5	N
O'Neill, Joe	1		0.5	Y
O'Shea, Terry	1	2	0.5	N
O'Sullivan, Dennis	1	1	0.5	N
Oakley, Anthony	1	2	0.5	N
Obeng, William	1		0.5	Y
Oberdorf, Todd	2		1	Y
Ochs, Craig	1		0.5	Y
Octobre, Sandino	4		2	Y
Odenthal, David	2		1	Y
Odiorne, Charles	1		0.5	Y
Odunayo Ojo, Oyeniran Olalere	5		2.5	Y
Ogawa, Michihiro	4		2	Y
Ogden, Marques	1	1	0.5	N
Ogle, Kendall	1	1	0.5	N
Ogletree, Craig	1	1	0.5	N
Ohrvall, Stefan	1		0.5	Y
Ohtaki, Yuji	1		0.5	Y
Ojo, Onome	1		0.5	Y
Oladipo, Gabriel	1		0.5	Y
Olds, Rod	1		0.5	Y
Olford, Jason	1		0.5	Y
Olinger, Jon	1		0.5	Y
Oliver, Jeff	2	1	1	N
Oliver, Maurice	1	1	0.5	N
Olsen, Eric	1		0.5	Y
Olson, Drew	1		0.5	Y
Olson, Ryan	1		0.5	Y
Olszewski, Gerald	3		1.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Oltmanns, Chris	1		0.5	Y
Opoku, Bernard	1		0.5	Y
Ornstein, Gus	1		0.5	Y
Ortiz, Robert	1		0.5	Y
Ortiz, Tony	3		1.5	Y
Orton, Jason	1		0.5	Y
Osborne, Scot	2		1	Y
Osei, Claudius	2		1	Y
Otis, Jeff	1		0.5	Y
Outlaw, J.J.	1		0.5	Y
Owens, Billy	2	1	1	N
Owens, Darrick	1	1	0.5	N
Owens, Dondre	1		0.5	Y
Owens, Kerry	1		0.5	Y
Ozongwu, Onoh	1		0.5	Y
Pace, Andrew	1		0.5	Y
Pace, Frank	1		0.5	Y
Padget, Jason	1		0.5	Y
Pagac, Fred	1		0.5	Y
Paige, Melvin	2		1	Y
Painter, Carl	1	2	0.5	N
Pakulak, Glenn	2	2	1	N
Palafox, Jonathan	1		0.5	Y
Palmer, Dan	1		0.5	Y
Palmer, Emile	3	1	1.5	N
Palmer, Paul	2	3	1	N
Palmer, Randy	1	1	0.5	N
Pape, Tony	2		1	Y
Papin, Steve	1		0.5	Y
Parent, Ralph	1		0.5	Y
Paris, Steve	1		0.5	Y
Parker, Carl	2	2	1	N
Parker, Ezekiel	1		0.5	Y
Parker, Gary	2		1	Y
Parker, Jeff	1	1	0.5	N
Parker, Mike	1		0.5	Y
Parker, Ricky	1	1	0.5	N
Parker, Riddick	1	7	0	N
Parpan, Brad	1		0.5	Y
Parquet, Jeremy	1	3	0.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Parrish, James	1	3	0.5	N
Parrish, Terrance	1		0.5	Y
Parry, Josh	1	3	0.5	N
Parson, Rich	1	1	0.5	N
Parten, Ty	1	7	0	N
Patrick, Garin	1	1	0.5	N
Patrick, Greg	1		0.5	Y
Patterson, Elton	1	2	0.5	N
Patterson, Martin	1		0.5	Y
Patterson, Melvin	2		1	Y
Patton, Janssen	1		0.5	Y
Pau'u, Yepi	2		1	Y
Pawlik, Florian	1		0.5	Y
Payne, Bobby	1		0.5	Y
Pearce, Dusty	2		1	Y
Pearce, Mark	2		1	Y
Pears, Morgan	1	1	0.5	N
Pearson, Calvin	1	6	0	N
Pearson, Pepe	2		1	Y
Pease, Brent	2	2	1	N
Peat, Todd	1	6	0	N
Peck, Jared	1	1	0.5	N
Pederson, Doug	2	10	0	N
Peko, Tupe	1	2	0.5	N
Pelluer, Steve	2	7	0	N
Pelshak, Troy	2	2	1	N
Pendergrass, Jon	2		1	Y
Penn, Kawasak	1		0.5	Y
Peoples, Corey	1		0.5	Y
Peoples, Kevin	1		0.5	Y
Perez, Carlos	1		0.5	Y
Perez, Christopher	1		0.5	Y
Perez, Joe	1		0.5	Y
Perez, Michael	2		1	Y
Perkins, Justin	1		0.5	Y
Perkins, Tracey	1		0.5	Y
Perry, Jason	1	4	0.5	N
Perry, Leon	1		0.5	Y
Perry, Merceda	2		1	Y
Perry, William	1	10	0	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Perry-Smith, Ryan	1		0.5	Y
Perryman, Raymond	1	3	0.5	N
Peterson, Daunta	1		0.5	Y
Peterson, Devonte	3		1.5	Y
Peterson, Jason	1		0.5	Y
Peterson, Tim	1		0.5	Y
Petersson, Dan	2		1	Y
Petrof, Karl	1		0.5	Y
Pettersson, Jens	2		1	Y
Petty, Jermaine	1		0.5	Y
Pfeifenberger, Toko	1		0.5	Y
Philion, Ed	1	2	0.5	N
Phillips, Bobby	3	1	1.5	N
Phillips, Darrell	2		1	Y
Phillips, Jeremy	1		0.5	Y
Phillips, Jey	3		1.5	Y
Phillips, Josh	1		0.5	Y
Phillips, Rodnick	1		0.5	Y
Philyaw, Dino	1	3	0.5	N
Phipps, Joe	1		0.5	Y
Pickens, Dwight	1		0.5	Y
Pickett, Cody	1	2	0.5	N
Pierce, Charles	1		0.5	Y
Pietrowski, Edward	1		0.5	Y
Pinderhughes, Brandon	1		0.5	Y
Pinkard, Mike	2		1	Y
Pinkney, Cleveland	1	3	0.5	N
Pinson, Lawrence	1		0.5	Y
Pisetsky, Vitaly	1		0.5	Y
Pittman, Cedric	1		0.5	Y
Pittman, Thomas	1		0.5	Y
Pitts, DeRonnie	1		0.5	Y
Pizzo, Joe	1		0.5	Y
Pjanic, Julian	1		0.5	Y
Plantin, Tony	2		1	Y
Player, Scott	1	10	0	N
Pochman, Owen	1	2	0.5	N
Poe, Billy	2	1	1	N
Pointer, Chris	1		0.5	Y
Pointer, Deron	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Pollack, Fred	1		0.5	Y
Pollard, Jonathan	1		0.5	Y
Pope, O'Lester	2		1	Y
Popovich, Jeff	1		0.5	Y
Popson, Ted	1	5	0	N
Porter, David	1		0.5	Y
Porter, Juan	1		0.5	Y
Porter, Kevin	1	5	0	N
Porter, Quinton	1	1	0.5	N
Pospisil, Scott	3		1.5	Y
Postell, Malcolm	1		0.5	Y
Powe, Keith	1	2	0.5	N
Powell, Alvin	1	3	0.5	N
Powell, Calen	1		0.5	Y
Powell, Carl	1	7	0	N
Powell, Eric	2	2	1	N
Powell, Ronnie	1	1	0.5	N
Powell, Sean	1		0.5	Y
Power, Mike	1		0.5	Y
Powers, Ricky	1	1	0.5	N
Prater, Shino	1		0.5	Y
Presbury, Robert	2		1	Y
Presley, Bruce	1		0.5	Y
Preston, Charles	1		0.5	Y
Prevost, Nick	1		0.5	Y
Price, Idris	1		0.5	Y
Price, Shawn	1		0.5	Y
Priestley, David	2		1	Y
Prince, Ryan	2	1	1	N
Pringle, Mike	1	1	0.5	N
Pritchett, Wes	1	1	0.5	N
Proby, Bryan	2	1	1	N
Procell, Jarrett	1		0.5	Y
Proctor, Basil	1		0.5	Y
Proctor, Michael	2		1	Y
Pruce, David	2		1	Y
Pruitt, Etric	1	2	0.5	N
Pugh, Jimond	1		0.5	Y
Puleri, Charles	1		0.5	Y
Putzier, Rollin	3	2	1.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Quarshie, Michael	1		0.5	Y
Quass, Oliver	2		1	Y
Quast, Brad	2		1	Y
Quast, Heinz	1		0.5	Y
Quayle, Cam	1		0.5	Y
Quinnie, Willie	1		0.5	Y
Quinton, Dustin	1		0.5	Y
Rabe, Russell	1		0.5	Y
Rader, Jason	1	3	0.5	N
Rafferty, Ian	1	1	0.5	N
Ragans, Bill	1		0.5	Y
Raiola, Donovan	1	1	0.5	N
Randall, Jason	1		0.5	Y
Rantanen, Jarmo	1		0.5	Y
Rasmussen, Buck	1		0.5	Y
Rasul, Amir	1		0.5	Y
Ratliffe, Leslie	2		1	Y
Rawlings, Josh	1		0.5	Y
Ray, Bryan	1		0.5	Y
Ray, Leonard	1		0.5	Y
Ray, Marcus	1	1	0.5	N
Raynock, Chase	1		0.5	Y
Reader, Jamie	1	1	0.5	N
Redd, Robert	2		1	Y
Redmon, Tellis	1		0.5	Y
Redziniak, Ray	2		1	Y
Reece, John	1	1	0.5	N
Reed, Michael	2	2	1	N
Reed, Rayshun	1	1	0.5	N
Reed, Rodney	1		0.5	Y
Reem, Matt	1		0.5	Y
Reese, Allen	1	1	0.5	N
Reese, Jerry	1	1	0.5	N
Reese, Jerry	2	1	1	N
Reese, Jonathan	1		0.5	Y
Reessing, Dirk	2		1	Y
Regular, Moses	1	1	0.5	N
Rehage, Derek	1		0.5	Y
Rehder, Tom	1	3	0.5	N
Reid, Gary	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Reid, Ike	1		0.5	Y
Reid, Lamont	1	1	0.5	N
Reid, Nick	1		0.5	Y
Reiser, Thomas	1		0.5	Y
Rekuc, Brad	1		0.5	Y
Renfro, Dusty	2		1	Y
Renna, Mike	1		0.5	Y
Renner, Gunther	1		0.5	Y
Rentie, Caesar	2	1	1	N
Reuber, Alan	1	1	0.5	N
Reynolds, Don	3		1.5	Y
Reynolds, Joffrey	1	1	0.5	N
Rheem, Jamie	1		0.5	Y
Rhodes, Damien	1		0.5	Y
Rhodes, David	1		0.5	Y
Rhodes, Mike	1		0.5	Y
Rhodes, Reggie	1		0.5	Y
Rice, Al	1		0.5	Y
Rice, Anthony	1		0.5	Y
Rice, Jacob	1		0.5	Y
Rice, Matthew	1		0.5	Y
Rice, Tony	2		1	Y
Rice-Lockett, Terry	1		0.5	Y
Richard, Cisco	1		0.5	Y
Richard, Gary	2	1	1	N
Richardson, David	1	3	0.5	N
Richardson, Lawrence	1		0.5	Y
Richey, Derrick	1		0.5	Y
Richter, Marcus	4		2	Y
Ricker, A.J.	1		0.5	Y
Rideaux, Darrell	1		0.5	Y
Ridgley, Troy	3		1.5	Y
Riecke, Hans-Ulrich	1		0.5	Y
Riggins, Quentin	1		0.5	Y
Riggs Jr., Gerald	1		0.5	Y
Rilatt, Dave	1		0.5	Y
Riley, Andre	1		0.5	Y
Riley, Earl	2	1	1	N
Ritchey, James	2	1	1	N
Ritter, Craig	2		1	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Ritzmann, Constantin	1	1	0.5	N
Rivers, David	2		1	Y
Robb, Doug	1		0.5	Y
Robbins, Monte	1		0.5	Y
Robeen, Craig	1		0.5	Y
Roberts, John	1		0.5	Y
Robertson, Barry	1		0.5	Y
Robertson, Reggie	1		0.5	Y
Robertson, Virgil	1		0.5	Y
Robinson, Darnell	1		0.5	Y
Robinson, Don	1		0.5	Y
Robinson, Ed	1	1	0.5	N
Robinson, Frank	1	2	0.5	N
Robinson, Jimmy	1		0.5	Y
Robinson, Jimmy	1		0.5	Y
Robinson, Robbie	1		0.5	Y
Robinson, Roderick	1		0.5	Y
Robinson, Roger	1		0.5	Y
Robinson, Terrence	3	1	1.5	N
Robsock, Tom	3		1.5	Y
Rocker, Tracy	1	2	0.5	N
Rockett, Ron	1		0.5	Y
Rockwood, Mike	1	1	0.5	N
Rodgers, Anthony	1		0.5	Y
Rodgers, Jeff	1		0.5	Y
Rodgers, Willie	1		0.5	Y
Rodríguez, Vicenç	3		1.5	Y
Rodrigue, Ruffin	1		0.5	Y
Rodriguez, Antonio	2		1	Y
Rodriguez, Joel	1		0.5	Y
Rodriguez, Robert	1		0.5	Y
Rodriguez, Tito	1		0.5	Y
Roehl, Jeff	1	1	0.5	N
Rogers, Antwaun	1		0.5	Y
Rogers, Brian	1		0.5	Y
Rogers, Ernie	2		1	Y
Rogers Jr., Glenn	1	1	0.5	N
Rogers, Kendrick	1		0.5	Y
Rogers, Kirk	1		0.5	Y
Rogers, Lamar	1	2	0.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Rogers, Ronald	1		0.5	Y
Rogers, Wayne	1		0.5	Y
Rohloff, Cabel	1		0.5	Y
Rolen, Chad	1		0.5	Y
Rollins, Kevin	1		0.5	Y
Rolovich, Nick	1		0.5	Y
Rone, Andre	1		0.5	Y
Rooths, James	2		1	Y
Rosado, Carlos	7		3.5	Y
Roscoe, Chris	1		0.5	Y
Roscoe, James	1		0.5	Y
Rose, Blaine	1		0.5	Y
Rose, Shaun	1		0.5	Y
Rosenstiel, Robert	1	1	0.5	N
Rosga, Steve	1		0.5	Y
Ross, Derrick	1	1	0.5	N
Ross, Gregory	2		1	Y
Ross, Isaiah	1		0.5	Y
Ross, Jerry	1		0.5	Y
Ross, Oliver	1	7	0	N
Ross, Phil	2		1	Y
Ross, Richie	1		0.5	Y
Roth, Tom	1		0.5	Y
Rouen, Tom	1	13	0	N
Roundtree, Alphonso	1	1	0.5	N
Roundtree, Durand	1		0.5	Y
Rountree, Glenn	1		0.5	Y
Rouse, Wardell	1	1	0.5	N
Rowan, Levonne	1		0.5	Y
Rowe, Joe	1	1	0.5	N
Rowell, Eugene	1	1	0.5	N
Rowell, Tony	1		0.5	Y
Royal, Desmond	2		1	Y
Royal, Ricky	1	1	0.5	N
Royster, Mazio	1	3	0.5	N
Rozic, Bernard	2		1	Y
Rubin, DeAndrew	1		0.5	Y
Rubin, Marek	1		0.5	Y
Rubley, T.J.	1	2	0.5	N
Rueda, Marco	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Ruffin, Aaron	1		0.5	Y
Ruffin, Jonathan	1		0.5	Y
Ruiz, Jose	1		0.5	Y
Rundberg, Peter	1		0.5	Y
Rush, Torrey	1		0.5	Y
Russell, Fred	1		0.5	Y
Russell, Jeff	2		1	Y
Russell, Sean	2		1	Y
Ruth, Mike	2	2	1	N
Rutherford, Reynard	1		0.5	Y
Rutherford, Rod	1		0.5	Y
Ruzek, Roger	1	7	0	N
Ryans, Larry	2	1	1	N
Rybarczyk, Slawomir	2		1	Y
Sacca, John	2		1	Y
Sacca, Tony	2	1	1	N
Sadler, Adrian	1		0.5	Y
Saenz, Richard	1		0.5	Y
Salden, Youri	1		0.5	Y
Saldi, John	1		0.5	Y
Sale, Ken	2		1	Y
Salmon, Mike	2	1	1	N
Salo, Juha	1		0.5	Y
Saltz, Lee	2		1	Y
Sam, P.K.	1	1	0.5	N
Samp, Chris	1		0.5	Y
Sams, Tierre	1		0.5	Y
Samuel, Cedric	1		0.5	Y
Samuel, Peda	1		0.5	Y
Sanchez, Jeff	2		1	Y
Sancho, Ron	2		1	Y
Sander, Mark	2	1	1	N
Sanders, Brandon	1	3	0.5	N
Sanders, David	2		1	Y
Sanders, Steve	1	1	0.5	N
Sanders, Tracy	2		1	Y
Sanders, Tyrone	1		0.5	Y
Sanders, Vaughn	1		0.5	Y
Sandidge, Tim	1	1	0.5	N
Sandlin, Kenny	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Sands, Justin	1		0.5	Y
Sands, Mike	1		0.5	Y
Sands, Terdell	1	7	0	N
Sanford, Sulecio	1		0.5	Y
Sano, Tadani	1		0.5	Y
Sape, Lauvale	1	2	0.5	N
Sapega, Oleg	2		1	Y
Sapolu, Saute	1		0.5	Y
Sargeant, Shatony	2		1	Y
Sargent, Broderick	1	3	0.5	N
Sargent, Tony	2		1	Y
Sasano, Naoki	1		0.5	Y
Satomi, Kohei	4		2	Y
Saunders, Cedric	1	1	0.5	N
Saunders, Troy	1		0.5	Y
Sauve, Jeff	1		0.5	Y
Savage, Damon	1		0.5	Y
Savage, Ray	2		1	Y
Savage, Sebastian	1	2	0.5	N
Save, Bryan	2		1	Y
Savoie, Nicky	1	1	0.5	N
Saxton, Brian	1	2	0.5	N
Scaldaferri, Stephen	1		0.5	Y
Scales, Shawn	1		0.5	Y
Scates, Cody	1		0.5	Y
Scharf, Tim	1		0.5	Y
Scharff, Scott	1		0.5	Y
Schau, Tom	1		0.5	Y
Schenk, Volker	1		0.5	Y
Schlecht, John	2	1	1	N
Schlichting, Craig	2		1	Y
Schmidt, Brennan	1		0.5	Y
Schmidt, Dan	1		0.5	Y
Schmidt, Taylor	1		0.5	Y
Schmitt, Kyle	1		0.5	Y
Schnee, Yoan	5		2.5	Y
Schneider, Astor	1		0.5	Y
Schneider, Sebastian	1		0.5	Y
Schober, Daniel	2		1	Y
Schonewolf, Rich	2		1	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Schorejs, Derek	1		0.5	Y
Schroeder, Andreas	1		0.5	Y
Schumacher, Jerry	1		0.5	Y
Schuster, Marcus	1		0.5	Y
Scifres, Steve	1	3	0.5	N
Sciullo, Steve	1	2	0.5	N
Scott, Cedric	1	2	0.5	N
Scott, Chad	1		0.5	Y
Scott, Earl	3		1.5	Y
Scott, Gregory	1	2	0.5	N
Scott, Joseph	1		0.5	Y
Scott, Kevin	1	3	0.5	N
Scott, Michael	1		0.5	Y
Scott, Patrick	1		0.5	Y
Scott, Pete	1		0.5	Y
Scott, Robert	1		0.5	Y
Scott, Sean	1		0.5	Y
Scott, Walter	2	1	1	N
Scott, Yusuf	1	3	0.5	N
Scukanec, Jason	1		0.5	Y
Seals, Mark	2		1	Y
Seals, Richard	1		0.5	Y
Searcy, Elliott	1		0.5	Y
Searcy, George	1		0.5	Y
Searels, Stacy	1		0.5	Y
Sears, Chad	1		0.5	Y
Seay, Clarence	1		0.5	Y
Seibert, Ingo	4		2	Y
Seiff, Jan	1		0.5	Y
Seigler, Dexter	2	2	1	N
Sellers, Donald	2		1	Y
Senczyszyn, Dave	1		0.5	Y
Setta, Nicholas	2		1	Y
Setterstrom, Chad	1		0.5	Y
Setzer, Bobby	1	2	0.5	N
Seumalo, Joe	1		0.5	Y
Sewell, Josh	1		0.5	Y
Shabazz, Siddeeq	1	3	0.5	N
Shafer, Mike	1		0.5	Y
Shamburger, Clifton	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Shannon, John	2	2	1	N
Sharpe, Montique	1	1	0.5	N
Sharpe, Ricky	1		0.5	Y
Shaw, Bryant	3		1.5	Y
Shaw, Ricky	1	3	0.5	N
Shay, Brian	1		0.5	Y
Sheahan, Kevin	1		0.5	Y
Shearer, Curtis	1		0.5	Y
Sheldon, Dan	1		0.5	Y
Shell, Lin-J	1		0.5	Y
Shelley, Jason	4		2	Y
Shelling, Chris	1	3	0.5	N
Sherrell, Anthony	1		0.5	Y
Shields, Scott	1	2	0.5	N
Shimizu, Satoshi	1		0.5	Y
Shinsuke, Kashino	1		0.5	Y
Shipley, Ron	1		0.5	Y
Shivers, Jason	1	1	0.5	N
Shor, Alex	1		0.5	Y
Short, Jason	1	3	0.5	N
Shorts, Peter	1	1	0.5	N
Showell, Malcolm	3		1.5	Y
Shuck, Kofi	1		0.5	Y
Shufelt, Pete	1	1	0.5	N
Shuler, Alonzo	1		0.5	Y
Sievers, Todd	1		0.5	Y
Sign, Bobby	2		1	Y
Sikyala, Mukala	1		0.5	Y
Sileo, Dan	1	1	0.5	N
Silvers, Elliot	1	1	0.5	N
Silvestri, Don	2	2	1	N
Simmons, Antuan	1		0.5	Y
Simmons, Jason	1		0.5	Y
Simmons, Michael	1	2	0.5	N
Simmons, Rasheed	1		0.5	Y
Simmons, Sam	1	1	0.5	N
Simmons, Stacey	1	1	0.5	N
Simmons, Terrance	1	1	0.5	N
Simnjanovski, Brian	2		1	Y
Simon, Jose	2		1	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Simon, Salem	1		0.5	Y
Simons, Kevin	1	1	0.5	N
Simpson, John	1		0.5	Y
Simpson, Teto	2		1	Y
Simpson, Tim	1	1	0.5	N
Sims, Dominique	1		0.5	Y
Sims, Doug	1		0.5	Y
Sims, Kelly	3		1.5	Y
Sinclair, Matt	1	1	0.5	N
Singer, Paul	1		0.5	Y
Singleary, James	1		0.5	Y
Sischka, Mario	1		0.5	Y
Sissener, Phillip	2		1	Y
Skaggs, Justin	1	2	0.5	N
Skinner, Justin	1		0.5	Y
Slack, Reggie	1		0.5	Y
Slaten, Joey	1		0.5	Y
Slay, Henry	2	1	1	N
Slutsky, Mikhail	2		1	Y
Small, O.J.	1	1	0.5	N
Smider, Brian	2		1	Y
Smith, Akil	1		0.5	Y
Smith, Akili	1	4	0.5	N
Smith, Alvin	1		0.5	Y
Smith, Art	1		0.5	Y
Smith, Avrom	1		0.5	Y
Smith, Brad	1	1	0.5	N
Smith, Brian	1		0.5	Y
Smith, Brian	1	2	0.5	N
Smith, Cernel	2		1	Y
Smith, Chandler	1		0.5	Y
Smith, Chris	2		1	Y
Smith, Clifton	1	2	0.5	N
Smith, David	2		1	Y
Smith, Davis	1		0.5	Y
Smith, Dedric	3		1.5	Y
Smith, Dennis	1	1	0.5	N
Smith, Ed	1	3	0.5	N
Smith, Elliot	1	2	0.5	N
Smith, Emory	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Smith, Herman	1	2	0.5	N
Smith, Irvin	2		1	Y
Smith, J.J.	1		0.5	Y
Smith, Jamel	3		1.5	Y
Smith, Jermaine	1		0.5	Y
Smith, Joe	1		0.5	Y
Smith, Jonathan	2		1	Y
Smith, Justin	1	1	0.5	N
Smith, Kyle	1		0.5	Y
Smith, Lawrence	1	1	0.5	N
Smith, Leroy	1		0.5	Y
Smith, Marcus	1		0.5	Y
Smith, Marquis	1	3	0.5	N
Smith, Michael	1		0.5	Y
Smith, Nick	2		1	Y
Smith, Richard	1		0.5	Y
Smith, Richard	1	1	0.5	N
Smith, Roland	1		0.5	Y
Smith, Ron	1	1	0.5	N
Smith, Ryan	1		0.5	Y
Smith, Shaun	2		1	Y
Smith, Shawn	1		0.5	Y
Smith, Steve	1	1	0.5	N
Smith, Thomas	1		0.5	Y
Smith, Tracy	1		0.5	Y
Smith, Trent	1	1	0.5	N
Smith, Tyrone	2		1	Y
Smith, Willie	1		0.5	Y
Smith, Zuriel	1	1	0.5	N
Snead, Willie	1		0.5	Y
Snell, Ben	2		1	Y
Snell, Isaac	1	2	0.5	N
Snell, Shannon	1		0.5	Y
Snelling, Robbie	1		0.5	Y
Snelson, Eric	1		0.5	Y
Snow, Percy	1	3	0.5	N
Snyder, Chris	1		0.5	Y
Sochart, Peter	2		1	Y
Solano, Salomon	2		1	Y
Solomon, John	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Soltis, Paul	1		0.5	Y
Sommersell, Andre	1		0.5	Y
Soriano, Jamil	1		0.5	Y
Soumah, Marc	4		2	Y
Southward, Brandon	1		0.5	Y
Spann, Gregory	1		0.5	Y
Spears, Calvin	1		0.5	Y
Spencer, James	2		1	Y
Spikes, Rashon	1		0.5	Y
Spinner, Bryson	1		0.5	Y
Spragan, Donnie	1	6	0	N
Sprague, Jake	1		0.5	Y
Sprinkles, Kevin	1		0.5	Y
Stacy, Siran	4	1	2	N
Stafford, Shane	1		0.5	Y
Staine-Pyne, Frank	1		0.5	Y
Stallings, Robert	1	1	0.5	N
Stallworth, Cedric	2		1	Y
Stallworth, Larry	1		0.5	Y
Stambaugh, Phil	2		1	Y
Stamer, Josh	1	7	0	N
Stanley, Israel	3	1	1.5	N
Stanley, Matt	1	1	0.5	N
Stanley, Sylvester	1	1	0.5	N
Stansbury, Ed	1	1	0.5	N
Starceвич, Steve	1		0.5	Y
Starck, Justin	1		0.5	Y
Starling, Kendrick	1	1	0.5	N
Stedman, Troy	1	1	0.5	N
Steele, Ben	1	2	0.5	N
Steen, Grant	1		0.5	Y
Steitz, Nick	1		0.5	Y
Stelly, Joel	1		0.5	Y
Stemke, Kevin	1	2	0.5	N
Stenavich, Adam	1		0.5	Y
Stensrud, Andy	1		0.5	Y
Stephens, Eric	1		0.5	Y
Stephens, Leonard	1	1	0.5	N
Stephens, Richard	2	2	1	N
Stephenson, Milford	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Sterling, Rob	1		0.5	Y
Stevens, L.C.	1		0.5	Y
Stevenson, Derik	1		0.5	Y
Stewart, Ed	1		0.5	Y
Stewart, Todd	1		0.5	Y
Stewart, Vincent	1		0.5	Y
Still, Eric	2		1	Y
Stock, Mark	1	3	0.5	N
Stoerner, Clint	1	2	0.5	N
Stokes, Andy	1		0.5	Y
Stokes, Barry	2	8	0	N
Stonebreaker, Mike	1	2	0.5	N
Storm, Matt	1		0.5	Y
Stowers, Don	1		0.5	Y
Stowers, Tommie	2	3	1	N
Stradford, Troy	1	6	0	N
Strey, Derek	1		0.5	Y
Strickland, Timothy	1		0.5	Y
Strickland, Vernon	1		0.5	Y
Strohmeyer, Dax	1		0.5	Y
Strong, Derrick	3		1.5	Y
Stubbe, Kalle	1		0.5	Y
Stubbins, Willie	1		0.5	Y
Stubbs, Terrence	1		0.5	Y
Stuber, Tim	2		1	Y
Stuckey, Shawn	1	1	0.5	N
Studdard, Greg	1		0.5	Y
Studstill, Darren	1	3	0.5	N
Stukes, Dwayne	2		1	Y
Stull, Jim	2		1	Y
Sturgis, Oscar	1	1	0.5	N
Stursberg, Philipp	1		0.5	Y
Suarez, Mike	1		0.5	Y
Sumner, Colin	1		0.5	Y
Sumter, Glenn	1		0.5	Y
Sunaga, Takayuki	1		0.5	Y
Sunvold, Mike	1		0.5	Y
Surrency, Justin	1		0.5	Y
Sutter, Ryan	1	1	0.5	N
Sutton, Mike	3	1	1.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Sutton, Ricky	1	1	0.5	N
Swaggert, Brent	1		0.5	Y
Swain, Quentin	2		1	Y
Swann, Charles	2	1	1	N
Swanson, Brennen	1		0.5	Y
Sweeney, Kevin	1	2	0.5	N
Sweeney, Matt	1		0.5	Y
Swiney, Erwin	1	2	0.5	N
Symonette, Alan	1		0.5	Y
Symonette, Josh	1	1	0.5	N
Symons, B.J.	2		1	Y
Syptak, John	1		0.5	Y
Szeredy, Scott	2		1	Y
Tagoai, Junior	1		0.5	Y
Takavitz, Kyle	1		0.5	Y
Talamaivao, Pene	1		0.5	Y
Talley, Charles	1		0.5	Y
Taneyhill, Steve	1		0.5	Y
Tanks, Michael	1		0.5	Y
Taotoai, Josh	1		0.5	Y
Taplin, Greg	1		0.5	Y
Tarver, Hurley	2		1	Y
Tate, Adam	1		0.5	Y
Tate, Darian	1		0.5	Y
Tate, Joe	1		0.5	Y
Tate, Mark	1		0.5	Y
Tate, Willy	1	2	0.5	N
Taulealea, Samuel	1		0.5	Y
Taves, Josh	1	4	0.5	N
Taylor, Chris	1		0.5	Y
Taylor, Cordell	1	2	0.5	N
Taylor, James	1		0.5	Y
Taylor, Jay	1	1	0.5	N
Taylor, Jermaine	1		0.5	Y
Taylor, Mike	2		1	Y
Taylor, T.C.	1		0.5	Y
Taylor, Tony	1	1	0.5	N
Taylor, Tyrone	1		0.5	Y
Taylor, Winston	1		0.5	Y
Teichelman, Lance	1	1	0.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Tella, Gustavo	3		1.5	Y
Tellison, A.C.	1		0.5	Y
Telp, Davon	1		0.5	Y
Temming, Frank	7		3.5	Y
Tenner, Jason	1		0.5	Y
Terrell, David	1	5	0	N
Terry, Nate	1		0.5	Y
Texada, Kip	1		0.5	Y
Tharpe, Nigel	1		0.5	Y
Thieneman, Chris	1		0.5	Y
Thigpen, Tommy	2		1	Y
Thomas, Art	1		0.5	Y
Thomas, Corey	1	1	0.5	N
Thomas, Cornell	1	1	0.5	N
Thomas, Craig	1		0.5	Y
Thomas, Dave	2		1	Y
Thomas, Dee	1	1	0.5	N
Thomas, Edward	1	3	0.5	N
Thomas, Efrum	1		0.5	Y
Thomas, Franklin	1		0.5	Y
Thomas, Johnny	1		0.5	Y
Thomas, Malcolm	1		0.5	Y
Thomas, Mark	1	1	0.5	N
Thomas, Markus	3		1.5	Y
Thomas, Marvin	1	1	0.5	N
Thomas, Roderick	1		0.5	Y
Thomas, Rodney	1	4	0.5	N
Thomas, Sean	1		0.5	Y
Thomas, Wilson	1		0.5	Y
Thomassie, Ryan	1		0.5	Y
Thompkins, Gary	1		0.5	Y
Thompson, Anthony	1	1	0.5	N
Thompson, Aubrey	1		0.5	Y
Thompson, Charles	2		1	Y
Thompson, Chris	1	1	0.5	N
Thompson, David	1	2	0.5	N
Thompson, David	1		0.5	Y
Thompson, Duvol	1		0.5	Y
Thompson, Jamie	1	1	0.5	N
Thompson, Kevin	2	1	1	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Thompson, Orrin	1		0.5	Y
Thompson, Shelton	1		0.5	Y
Thompson, Steve	1		0.5	Y
Thornton, James	3		1.5	Y
Thornton, Randy	1		0.5	Y
Thorp, Deron	2		1	Y
Thorson, Chad	1		0.5	Y
Threats, Jabbar	2	3	1	N
Thurmon, Elijah	1		0.5	Y
Thweatt, Byron	1	1	0.5	N
Timothee, Kevin	1		0.5	Y
Tinsley, Derrick	1		0.5	Y
Tisdale, Casey	1		0.5	Y
Titely, Michael	4		2	Y
Toeaina, Albert	1		0.5	Y
Tokimoto, Masaki	2		1	Y
Tolbert, Michael	1		0.5	Y
Toler, Burl	1		0.5	Y
Topcu, Cüneyt	4		2	Y
Torretta, Gino	1	2	0.5	N
Torrey, Andre	1		0.5	Y
Torrey, Brandon	1		0.5	Y
Torriero, Ben	2		1	Y
Totten, Erik	1	1	0.5	N
Tovo, Tom	5		2.5	Y
Townsend, Larry	2		1	Y
Trafford, Rodney	1	1	0.5	N
Trainor, Kendall	2		1	Y
Travis, Mack	1	1	0.5	N
Traynor, Pete	1		0.5	Y
Tregubov, Maxim	1		0.5	Y
Trieb, Darrin	1		0.5	Y
Tripp, Dennis	1		0.5	Y
Trout, Brad	1		0.5	Y
Truitt, Leroy	1		0.5	Y
Tsuji, Haruhito	1		0.5	Y
Tuch, Sebastian	1		0.5	Y
Tucker, Anthony	1		0.5	Y
Tucker, Erroll	1	2	0.5	N
Tucker, Josh	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Tucker, Mark	1	1	0.5	N
Tuell, Guy	1		0.5	Y
Tugbenyoh, Mawuko	2		1	Y
Tuipala, Joe	2	2	1	N
Tunney, Jono	1		0.5	Y
Tupai, Tai	1		0.5	Y
Turner, Derrick	2		1	Y
Turner, Eric	1		0.5	Y
Turner, Hart	1		0.5	Y
Turner, Lonnie	2		1	Y
Turner, Shawn	1		0.5	Y
Turner, Vernon	3	6	0	N
Tuten, Henry	1		0.5	Y
Tuthill, James	1	1	0.5	N
Tynes, Lawrence	1	9	0	N
Uberschar, Jens	1		0.5	Y
Ude, Mathias	1		0.5	Y
Uestuenel, Alexander	1		0.5	Y
Ulmer, Artie	1	7	0	N
Ulrich, Matt	1	2	0.5	N
Unertl, Jeremy	1		0.5	Y
Van Dyke, Ryan	1		0.5	Y
Vance, Chris	1		0.5	Y
Vandermade, Lenny	1		0.5	Y
Vandervelt, Jamie	1		0.5	Y
Vann, LaDaris	1		0.5	Y
Vaughn, Damian	2		1	Y
Vaughn, Jon	1	4	0.5	N
Vaughn, Lee	1		0.5	Y
Vaughn, Vickiel	1	1	0.5	N
Venzke, Patrick	3		1.5	Y
Verdon, Jimmy	1	1	0.5	N
Vick, Roger	1	4	0.5	N
Vickerson, Quarte	1		0.5	Y
Vieira, Steven	2		1	Y
Viger, David	1		0.5	Y
Ville, Zach	2		1	Y
Vines, Ken	1		0.5	Y
Vinson, Tony	1	2	0.5	N
Vissa, Sergio	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Vitale, John	2		1	Y
Volk, Dave	1		0.5	Y
Vollath, Thomas	1		0.5	Y
Von Garnier, Max	1		0.5	Y
Voorhees, Barry	2		1	Y
Waddell, Bennitte	1		0.5	Y
Waddy, Jude	1	2	0.5	N
Wadley, Shannon	1		0.5	Y
Wagner, Keith	2		1	Y
Walden, David	1		0.5	Y
Walden, Willie	1		0.5	Y
Waldron, Emmett	4		2	Y
Walker, Bruce	2	1	1	N
Walker, Bryan	1		0.5	Y
Walker, Corey	1	1	0.5	N
Walker, Demetrios	1		0.5	Y
Walker, Jay	1	2	0.5	N
Walker, John	1		0.5	Y
Walker, Wayne	1	1	0.5	N
Walker, Willie	1		0.5	Y
Wallace, Anthony	1		0.5	Y
Wallace, Butchie	1		0.5	Y
Wallace, Jason	1		0.5	Y
Wallace, Larry	2		1	Y
Wallace, Mike	1		0.5	Y
Walls, Gavin	1		0.5	Y
Walls, Henry	1	1	0.5	N
Walsh, Pat	1		0.5	Y
Walters, Matt	1	1	0.5	N
Walton, Tim	2		1	Y
Ward, Chad	1		0.5	Y
Ward, Chris	3	1	1.5	N
Ward, LaShaun	1	1	0.5	N
Ward, Phillip	1	2	0.5	N
Ware, Andre	1	4	0.5	N
Ware, Brad	1		0.5	Y
Warne, Jim	1	1	0.5	N
Warner, Josh	1	1	0.5	N
Warren, Brent	1		0.5	Y
Warren, Craig	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Warren, Jesse	3		1.5	Y
Washburn, Brady	1		0.5	Y
Washburn, Cliff	2		1	Y
Washington, Gerard	1		0.5	Y
Washington, John David	1		0.5	Y
Washington, Keith	2		1	Y
Washington, Mark	1		0.5	Y
Washington, Sean	1		0.5	Y
Washington, T.J.	1		0.5	Y
Washington, Tavares	1	1	0.5	N
Washington, Terrell	1		0.5	Y
Washington, Thomas	1		0.5	Y
Washington, Vann	1		0.5	Y
Waters, Jason	1		0.5	Y
Waters, Melvin	1		0.5	Y
Watkins, James	1		0.5	Y
Watkins, Mike	2		1	Y
Watkins, Tony	2		1	Y
Watson, Ken	1		0.5	Y
Watson, Tim	1	4	0.5	N
Watton, Chris	1		0.5	Y
Watts, Daniel	3		1.5	Y
Watts, Jason	2		1	Y
Weaver, Jarrell	1		0.5	Y
Webb, David	3		1.5	Y
Webster, Mike	1		0.5	Y
Wei, Gao	1		0.5	Y
Welch, Herb	1	6	0	N
Wells, Kent	1	1	0.5	N
Werdekker, Hans	1		0.5	Y
Wesley, Joe	1	2	0.5	N
West, Derek	1	3	0.5	N
West, Marcus	1		0.5	Y
West, Ronnie	2	1	1	N
Westbrooks, David	1		0.5	Y
Westbrooks, Jerry	1		0.5	Y
Whalen, James	1	3	0.5	N
Wheeler, Randy	1		0.5	Y
Wheeler, Stephon	1		0.5	Y
Whelihan, Tom	1		0.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
White, Anthony	1		0.5	Y
White, Brent	2		1	Y
White, Derrick	1		0.5	Y
White, Erik	1		0.5	Y
White, Jamal	1		0.5	Y
White, Jerard	1		0.5	Y
White, Maurice	1		0.5	Y
White, Robb	1	3	0.5	N
White, Russell	1	1	0.5	N
White, Stan	1		0.5	Y
White, Stylez	1	4	0.5	N
White, Ted	2		1	Y
Whitfield, Eric	1		0.5	Y
Whitman, Josh	1	1	0.5	N
Whitmore, Dennis	1		0.5	Y
Whittaker, Huey	1		0.5	Y
Whittaker, Scott	2		1	Y
Whittington, Daryl	1		0.5	Y
Wickman, Ryland	1		0.5	Y
Wiese, Brett	1		0.5	Y
Wiggins, Lee	1		0.5	Y
Wiggins, Paul	1	2	0.5	N
Wike, Todd	1		0.5	Y
Wilbourn, Shawn	1		0.5	Y
Wilburn, Terry	2		1	Y
Wilder, Sam	1		0.5	Y
Wilkerson, Eric	2	1	1	N
Wilkins, David	1	1	0.5	N
Wilkins, Greg	1		0.5	Y
Wilkinson, Calvin	1		0.5	Y
Wilkinson, Rafe	1		0.5	Y
Williams, Albert	1	1	0.5	N
Williams, Aric	1		0.5	Y
Williams, Armon	1	1	0.5	N
Williams, Ben	1	2	0.5	N
Williams, Brad	1		0.5	Y
Williams, Byron	2	3	1	N
Williams, Clarence	1	1	0.5	N
Williams, Clarence	1	1	0.5	N
Williams, Clay	2		1	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Williams, Curtis	1		0.5	Y
Williams, Curtis	1		0.5	Y
Williams, DeMario	2		1	Y
Williams, Doug	1	2	0.5	N
Williams, Gerald	1		0.5	Y
Williams, Greg	2		1	Y
Williams, James	2		1	Y
Williams, John	1	2	0.5	N
Williams, K.D.	1	3	0.5	N
Williams, Kevin	2	1	1	N
Williams, Lamanzer	1	1	0.5	N
Williams, Larry	1		0.5	Y
Williams, Lauren	1		0.5	Y
Williams, Lenny	1	1	0.5	N
Williams, Marcus	1		0.5	Y
Williams, Marcus	1	1	0.5	N
Williams, Payton	1	1	0.5	N
Williams, Rickey	2		1	Y
Williams, Rodney	1	2	0.5	N
Williams, Rodney	1	1	0.5	N
Williams, Ronald	1		0.5	Y
Williams, Ronnie	2	4	1	N
Williams, Royd	1		0.5	Y
Williams, Seante	2		1	Y
Williams, Steve	1		0.5	Y
Williams, Steve	2		1	Y
Williams, Tashe	1		0.5	Y
Williams, Travis	1		0.5	Y
Williams, Willie	1	2	0.5	N
Williamson, Lee	1		0.5	Y
Willis, Darren	1		0.5	Y
Willis, Horace	1		0.5	Y
Willis, Keith	1		0.5	Y
Willis, Marcel	2		1	Y
Willis, Marcell	1		0.5	Y
Wilmot, Trevor	2	1	1	N
Wilson, Curtis	2		1	Y
Wilson, David	1	1	0.5	N
Wilson, Eric	1		0.5	Y
Wilson, Gillis	1	1	0.5	N

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Wilson, Harvey	2		1	Y
Wilson, James	2		1	Y
Wilson, Kennedy	1		0.5	Y
Wilson, Sheddrick	1	1	0.5	N
Wilson, Ted	1	1	0.5	N
Wilson, Walter	1	1	0.5	N
Wilson, Zach	2		1	Y
Winborne, Jamaine	1	2	0.5	N
Wing, Chris	1	1	0.5	N
Wing, David	1		0.5	Y
Wingrove, Ryan	1		0.5	Y
Winkler, Ulrich	3		1.5	Y
Wischnewski, Patrick	1		0.5	Y
Wisdom, Terrence	3	1	1.5	N
Wise, Ty	1		0.5	Y
Wishom, Jerron	1	1	0.5	N
Witczak, Jason	2		1	Y
Witherspoon, Jovan	1		0.5	Y
Witkowski, Dean	1		0.5	Y
Witkowski, John	1	2	0.5	N
Wolf, Patrick	1		0.5	Y
Wolfolk, Kevin	2		1	Y
Wong, Joe	2	1	1	N
Wong, Juan	2		1	Y
Wood, Joseph	1		0.5	Y
Woodbury, Tory	1	2	0.5	N
Woodfin, Zac	1	1	0.5	N
Woods, Jerry	1	2	0.5	N
Woods, Manley	1		0.5	Y
Woods, Rashaun	1	1	0.5	N
Woods, Thomas	2		1	Y
Woods, Tony	2	1	1	N
Woodson, Shawn	1		0.5	Y
Woolfork, Ronnie	2		1	Y
Wooten, Al	1		0.5	Y
Word, Mark	1	3	0.5	N
Wright, Claudius	3		1.5	Y
Wright, Darrell	2		1	Y
Wright, Keith	1		0.5	Y
Wright, Michael	3		1.5	Y

Player	Number of NFL Europe Seasons	Number of NFL Seasons	Added Eligible Seasons (excluding seasons beyond 5)	Played Only NFL Europe?
Wright, Sylvester	1	2	0.5	N
Wright, T.C.	2		1	Y
Wright, Thomas	1		0.5	Y
Wright-Fair, Shaumbe	1		0.5	Y
Wrobel, Brian	2		1	Y
Wulff, Paul	2		1	Y
Wyatt, Justin	1		0.5	Y
Wyatt, Willie	1	1	0.5	N
Wyche, John	1		0.5	Y
Wylie, Joey	1		0.5	Y
Wyman, Devin	1	2	0.5	N
Yalei, Shen	1		0.5	Y
Yamada, Shinzo	1		0.5	Y
Yancy, Richard	8		4	Y
Yniguez, Paul	1		0.5	Y
Young, Alan	1		0.5	Y
Young, Antwone	2		1	Y
Young, Charlie	2		1	Y
Young, Danny	1		0.5	Y
Young, Donnie	1		0.5	Y
Young, Glenn	1		0.5	Y
Young, Sam	1		0.5	Y
Young, Todd	1		0.5	Y
Younger, Jordan	3		1.5	Y
Yukhnovich, Artsem	1		0.5	Y
Yuma, Eric	1		0.5	Y
Yurkiewicz, Rich	2		1	Y
Zagorski, Ben	1		0.5	Y
Zatechka, Jon	2		1	Y
Zeno, Lance	1	2	0.5	N
Ziemann, Chris	1	1	0.5	N
Zimmerman, Scott	1		0.5	Y
Zitelli, Emmett	2		1	Y
Zolman, Greg	1		0.5	Y
Zumwalt, Rick	1		0.5	Y
Total			2143	2302

Exhibit 12

Estimated CTE Awards - July 2014 to April 2015

Player	Birth Date	Death Date	Age	Max CTE Award (in thousands) Accounting for Age	Seasons Played	Eligible Seasons Offset	CTE Award (in thousands) Accounting for Age and Eligible Seasons
Denton, Bob	7/24/1934	7/8/2014	79	160	5	0%	\$160.00
Venuto, Sam	11/2/1926	7/12/2014	87	50	1	-80%	\$10.00
Leiding, Jeff	10/28/1961	7/13/2014	52	2300	2	-60%	\$920.00
Morton, John	9/1/1929	7/19/2014	84	50	1	-80%	\$10.00
Walker, Mickey	10/14/1939	7/19/2014	74	600	5	0%	\$600.00
DiPierro, Ray	8/22/1926	7/20/2014	87	50	2	-60%	\$20.00
McNamara, Bob	8/12/1931	7/20/2014	82	50	2	-60%	\$20.00
Austin, Ocie	1/8/1947	7/22/2014	67	980	4	-20%	\$784.00
Newhouse, Robert	1/9/1950	7/22/2014	64	1200	12	0%	\$1,200.00
Sprinkle, Ed	9/3/1923	7/28/2014	90	50	12	0%	\$50.00
Cox, James E. 'Jim'	9/6/1920	7/29/2014	93	50	1	-80%	\$10.00
Moss, Perry	8/4/1926	8/7/2014	88	50	1	-80%	\$10.00
Lloyd, Dave	11/9/1936	8/9/2014	77	160	12	0%	\$160.00
Daniels, Dave	4/5/1941	8/19/2014	73	600	1	-80%	\$120.00
Ladygo, Pete	6/23/1925	8/22/2014	89	50	2	-60%	\$20.00
Castete, Jesse	9/3/1933	8/29/2014	80	50	2	-60%	\$20.00
Holzer, Tom	8/2/1945	8/30/2014	69	980	1	-80%	\$196.00
Powell, Charlie	4/4/1932	9/1/2014	82	50	7	0%	\$50.00
Humphrey, Donnie	4/20/1961	9/2/2014	53	2300	3	-40%	\$1,380.00
McIntosh, Toddrick	1/22/1972	9/5/2014	42	4000	2	-60%	\$1,600.00
Rudnick, Tim	3/6/1952	9/7/2014	62	1200	1	-80%	\$240.00
Saidock, Tom	2/26/1930	9/7/2014	84	50	4	-20%	\$40.00
Gonsoulin, Goose	6/7/1938	9/8/2014	76	160	8	0%	\$160.00
Bironas, Rob	1/29/1978	9/20/2014	36	4000	9	0%	\$4,000.00
Bruckner, Les	4/16/1918	9/21/2014	96	50	1	-80%	\$10.00
Ross, Scott	12/7/1968	9/22/2014	45	3200	1	-80%	\$640.00
Manoukian, Don	6/9/1934	9/23/2014	80	50	1	-80%	\$10.00

Data regarding birth date, death date, and age taken from www.oldestlivingprofootball.com.Data regarding number of seasons played taken from www.nfl.com.

Estimated CTE Awards - July 2014 to April 2015

Player	Birth Date	Death Date	Age	Max CTE Award (in thousands) Accounting for Age	Seasons Played	Eligible Seasons Offset	CTE Award (in thousands) Accounting for Age and Eligible Seasons
Kincaid, Blackie	8/11/1930	9/25/2014	84	50	1	-80%	\$10.00
Boeke, Jim	9/11/1938	9/26/2014	76	160	9	0%	\$160.00
Smith, Robert G. 'Bob'	2/23/1933	9/28/2014	81	50	2	-60%	\$20.00
Drungo, Elbert	4/30/1943	10/11/2014	71	600	9	0%	\$600.00
Jones, Aki	10/25/1982	10/12/2014	31	4000	1	-80%	\$800.00
Best, Art	3/18/1953	10/14/2014	61	1200	3	-40%	\$720.00
Steiner, Roy	8/27/1927	10/18/2014	87	50	2	-60%	\$20.00
Biodrowski, Dennis	6/27/1940	10/20/2014	74	600	5	0%	\$600.00
Bramlett, John	7/7/1941	10/23/2014	73	600	7	0%	\$600.00
Collins, Mo	9/22/1976	10/26/2014	38	4000	6	0%	\$4,000.00
Soltau, Gordy	1/25/1925	10/26/2014	89	50	9	0%	\$50.00
McLaughlin, Leon	5/30/1925	10/27/2014	89	50	5	0%	\$50.00
Bracken, Don	2/16/1962	10/30/2014	52	2300	8	0%	\$2,300.00
Natowich, Andy	12/11/1918	10/30/2014	95	50	1	-80%	\$10.00
Hendley, Dick	8/6/1926	10/31/2014	88	50	1	-80%	\$10.00
Paul, Don	3/18/1925	11/8/2014	89	50	8	0%	\$50.00
Thomas, Orlando	10/21/1972	11/9/2014	42	4000	7	0%	\$4,000.00
Regner, Tom	4/19/1944	11/13/2014	70	600	6	0%	\$600.00
Epps, Bobby	3/25/1932	11/14/2014	82	50	3	-40%	\$30.00
Kelm, Larry	11/29/1964	11/22/2014	49	3200	7	0%	\$3,200.00
Brettschneider, Carl	12/2/1931	11/26/2014	82	50	8	0%	\$50.00
Fanucchi, Ledio	3/27/1931	11/27/2014	83	50	1	-80%	\$10.00
Yowarsky, Walt	5/10/1928	11/30/2014	86	50	6	0%	\$50.00
Swink, Jim	3/14/1936	12/3/2014	78	160	1	-80%	\$32.00
Flowers, Charlie	6/28/1937	12/7/2014	77	160	3	-40%	\$96.00
Behrman, Dave	11/9/1941	12/9/2014	73	600	3	-40%	\$360.00
Thurston, Fuzzy	12/29/1933	12/14/2014	80	50	10	0%	\$50.00

Data regarding birth date, death date, and age taken from www.oldestlivingprofootball.com.Data regarding number of seasons played taken from www.nfl.com.

Estimated CTE Awards - July 2014 to April 2015

Player	Birth Date	Death Date	Age	Max CTE Award (in thousands) Accounting for Age	Seasons Played	Eligible Seasons Offset	CTE Award (in thousands) Accounting for Age and Eligible Seasons
Brown Jr., Boyd	5/24/1952	12/18/2014	62	1200	4	-20%	\$960.00
Kelly, Bob	8/18/1938	12/18/2014	76	160	6	0%	\$160.00
Teteak, Deral	12/11/1929	12/18/2014	85	50	5	0%	\$50.00
Vereb, Ed	5/21/1934	12/18/2014	80	50	1	-80%	\$10.00
Alston, Mack	4/27/1947	12/24/2014	67	980	11	0%	\$980.00
Barry, Paul	8/7/1926	12/28/2014	88	50	4	-20%	\$40.00
Dyko, Chris	3/16/1966	12/28/2014	48	3200	1	-80%	\$640.00
Keating, Bill	11/22/1944	1/1/2015	70	600	2	-60%	\$240.00
Caldwell, Bryan	5/6/1960	1/3/2015	54	2300	1	-80%	\$460.00
Jessup, Bill	3/17/1929	1/3/2015	85	50	7	0%	\$50.00
Sherman, Allie	2/10/1923	1/3/2015	91	50	5	0%	\$50.00
Pugh, Jethro	7/3/1944	1/7/2015	70	600	14	0%	\$600.00
Karnofsky, Sonny	9/22/1922	1/9/2015	92	50	2	-60%	\$20.00
Cunningham, Doug	9/14/1945	1/13/2015	69	980	8	0%	\$980.00
Nagel, Ray	5/18/1927	1/15/2015	87	50	1	-80%	\$10.00
Henson, Gary	9/8/1940	1/20/2015	74	600	2	-60%	\$240.00
Roffler, Bill	9/16/1930	1/20/2015	84	50	1	-80%	\$10.00
Atkins, George	4/10/1932	1/21/2015	82	50	1	-80%	\$10.00
Mason, Tommy	7/8/1939	1/22/2015	75	160	11	0%	\$160.00
Pense, Leon	2/5/1922	1/22/2015	92	50	1	-80%	\$10.00
McKinnon, Don	8/28/1941	1/25/2015	73	600	2	-60%	\$240.00
Freitas, Jesse	9/10/1951	2/8/2015	63	1200	2	-60%	\$480.00
Enyart, Bill	4/28/1947	2/10/2015	67	980	3	-40%	\$588.00
Glick, Gary	5/14/1930	2/11/2015	84	50	7	0%	\$50.00
Towns, Bobby	3/17/1938	2/11/2015	76	160	2	-60%	\$64.00
McCusker, Jim	5/13/1936	2/13/2015	78	160	7	0%	\$160.00
Davis, Jack O.	2/19/1933	2/15/2015	81	50	1	-80%	\$10.00

Data regarding birth date, death date, and age taken from www.oldestlivingprofootball.com.Data regarding number of seasons played taken from www.nfl.com.

Estimated CTE Awards - July 2014 to April 2015

Player	Birth Date	Death Date	Age	Max CTE Award (in thousands) Accounting for Age	Seasons Played	Eligible Seasons Offset	CTE Award (in thousands) Accounting for Age and Eligible Seasons
Duncan, Clyde	2/5/1961	2/15/2015	54	2300	2	-60%	\$920.00
Lassiter, Ike	11/15/1940	2/15/2015	74	600	10	0%	\$600.00
Modzelewski, Ed	1/13/1929	2/27/2015	86	50	6	0%	\$50.00
Bettis, Tom	3/17/1933	2/28/2015	81	50	9	0%	\$50.00
Wilson, Jerry	12/9/1936	3/5/2015	78	160	2	-60%	\$64.00
Lewis, Dan	2/14/1936	3/6/2015	79	160	9	0%	\$160.00
Hensley, Dick	9/8/1927	3/7/2015	87	50	3	-40%	\$30.00
Toneff, Bob	6/23/1930	3/15/2015	84	50	12	0%	\$50.00
O'Malley, Joe	1/20/1932	3/20/2015	83	50	2	-60%	\$20.00
Kendrick, Vince	3/18/1952	3/21/2015	63	1200	2	-60%	\$480.00
McGill, Ralph	4/28/1950	3/21/2015	64	1200	8	0%	\$1,200.00
Torgeson, Torgy	2/28/1929	3/23/2015	86	50	7	0%	\$50.00
Phillips, Jimmy 'Red'	2/5/1936	3/25/2015	79	160	10	0%	\$160.00
LeBaron, Eddie	1/7/1930	4/1/2015	85	50	11	0%	\$50.00
Smith Jr., J.D.	7/19/1931	4/1/2015	83	50	11	0%	\$50.00
Cathcart, Sam	7/7/1924	4/3/2015	90	50	3	-40%	\$30.00
Middleton, Terdell	4/8/1955	4/3/2015	59	1400	7	0%	\$1,400.00
Sumner, Charlie	10/19/1930	4/4/2015	84	50	6	0%	\$50.00
Wood, Dick	2/29/1936	4/4/2015	79	160	5	0%	\$160.00
Looney, Don	9/2/1916	4/5/2015	98	50	3	-40%	\$30.00
Papit, Johnny	7/25/1928	4/6/2015	86	50	3	-40%	\$30.00
Powell, Art	2/25/1937	4/6/2015	78	160	10	0%	\$160.00
Szaro, Rich	3/7/1948	4/8/2015	67	980	5	0%	\$980.00
Graves, Ray	12/31/1918	4/10/2015	96	50	3	-40%	\$30.00
Mutscheller, Jim	3/31/1930	4/10/2015	85	50	8	0%	\$50.00
Gunn, Jimmy	11/27/1948	4/11/2015	66	980	7	0%	\$980.00
Witucki, Cas 'Slug'	5/26/1928	4/19/2015	86	50	6	0%	\$50.00

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Estimated CTE Awards - July 2014 to April 2015

Player	Birth Date	Death Date	Age	Max CTE Award (in thousands) Accounting for Age	Seasons Played	Eligible Seasons Offset	CTE Award (in thousands) Accounting for Age and Eligible Seasons
Buffone, Doug	6/27/1944	4/20/2015	70	600	14	0%	\$600.00
St. Clair, Bob	2/18/1931	4/20/2015	84	50	11	0%	\$50.00
Bednarik, Chuck	5/1/1925	3/21/2015	89	50	14	0%	\$50.00
					Average CTE Award:		\$421.00
					Value Added:		\$44,626.00

Data regarding birth date, death date, and age taken from www.oldestlivingprofootball.com.Data regarding number of seasons played taken from www.nfl.com.